Submissions on Adequacy of Consultation received during Acceptance

TR010032 – Lower Thames Crossing Project

Number	Name	Date
1	Thurrock Scouts	5 November 2022
2	Thames Crossing Action Group	9 November 2022
3	Transport for London	16 November 2022

From:	[redacted]
To:	Lower Thames Crossing
Subject:	Lower Thames Crossing - Inadequacies of Consultation
Date:	05 November 2022 16:12:22
Attachments:	Lower Thames Crossing - Response to Local Refinement Consultation - June 2022 - FINAL.pdf

Hi,

I have been co-ordinating Thurrock Scouts responses to the various consultations since 2016. Attached, is our response to the last consultation held in June 2022.

We have attended each of the public events during the last 6 years and raised our concerns, relating to the impact on Condovers Scout Activity Centre. Generally, we have found it difficult to engage with the staff at the public events because most of them have little experience of the project and are mainly new recruits. During the process we have learnt to ask to see the experienced staff, who are normally located somewhere out of view. On each occasion we have been asked to document our concerns, and response would be provided after the event, this rarely happens.

Once again, we visited the East Tilbury event, which was a late addition, for the Local Refinement Consultation held in June 2022. We managed to meet with a number of senior LTC project staff to discuss our concerns especially around the published documentation covering Private Recreational Facilities, which contained a number of incorrect statements. Because they only require access to 150 Square Metres of our land during construction and ongoing rights to access, once operational, they totally drummed down the impact on our operation, without discussion, and consequently published incorrect information. We have approximately 1300 members, under the age of 18 years, using this site so **Safeguarding and Security of these young people** is our number one priority.

We were again asked to document our discussion and concerns, which we did as part of the response, and were assured that someone would come back to us.

Our first contact from LTC after the consultation was received on 2nd August, requesting a meeting. I responded that I was not prepared to meet until we had responses to the points submitted as part of the local Refinement Consultation. We finally received a response to the points raised on 24th October 2022, over 4 months after submission. I have now requested a meeting with them.

We still haven't seen data relating to environmental impact on our site during construction and once operational, if approved. Each year, the peak period of our operation would have 200 plus young people sleeping under canvas, so noise and air quality data is important to us.

Thank you for giving me the opportunity to raise my concerns on LTC consultations.

Stewart Abbott

Thurrock Scouts - Project Leader (Volunteer)

Response to LTC Local Refinement Consultation:

This response has been produced on behalf of Thurrock District Scout Council (TDSC) any questions or follow-up should be addressed to Stewart Abbott via Email: stewart_abbott@msn.com.

Lower Thames Crossing - Overview

Scouting in Thurrock:

Thurrock District Scout Council (TDSC) provide activities to the youth of Thurrock through 19 locations from Ockendon in the West, Orsett and Chadwell in the centre and Stanford and Corringham in the East. There are approximately 1,300 members who benefit from the activities, delivered by our 450 volunteers, on a weekly basis. As well as delivering localised activities, we arrange for pan Borough events so that all young people can experience skills and activities which may only be available in one part of the Borough.

At the centre of our Scouting Borough is the Condovers Scout Activity Centre located in Church Road within the East Tilbury ward. This centre has been developed and evolved over 70 years and is key to supporting the purpose and method of Scouts. During the last 11 years a major regeneration programme has been undertaken with £250K being invested, plus an equivalent amount of voluntary skilled labour.

The proposal to develop the LTC project, within what is currently a peaceful rural setting, would increase the traffic noise and at night new road lighting could potentially increase the light pollution of the area.:

Scouts exists to actively engage and support young people in their personal development. They should feel empowered to make a positive contribution to society. This is achieved by running programmes which include:

- Enjoy what they are doing and have fun.
- Take part in activities indoors and outdoors.
- Learn by doing.
- Share in spiritual reflection.
- Take responsibility and make choices.
- Undertake new and challenging activities.
- Make and live by their Promise.

Any impact on the availability of this centre, through increased travel times and road closures during construction, plus environmental damage, noise, air & light pollution, has the potential to impact the development of the youth living in the Borough of Thurrock. During the last two seasons we have had to severely reduce the activities at our centre due to COVID and seen the negative impact on our members. Luckily, we have now opened fully and members are enjoying the activity centre again.

TDSC strongly oppose the current LTC proposal because it is not addressing the root cause of the traffic problems crossing the river Thames to the East of London. During the life of the current Dartford Crossing, we have seen the capacity increase, but also additional junctions added.

We accept that there is a requirement to increase capacity to move vehicles across the Thames but, there is no indication of the volume of vehicles which need to move across the Thames, without any requirement to access the Boroughs of Dartford and Thurrock. In our opinion, there is a requirement for a superhighway between M25 junctions 3 and 29, without entrances and exits.

The current proposed LTC will go through the middle of the Borough and unlikely to provide any tangible benefits to the residents and will result in many years of disruption to the roads network. Also, the proposal rejected the option of taking the road under the Tilbury Loop Railway as Highways England wanted to retain the option for any additional connections in the future, repeating the problems of the current crossing.

Lower Thames Crossing – Response to Local Refinement Consultation

Background:

Condovers Scout Activity Centre (Condovers) is approximately 3.5 acres and is located on the south side of Church Road between Cooper Shaw Road and Low Street Lane. Condovers is a peaceful rural setting 'an oasis' in a heavily populated and industrial Borough. Condovers is used all year round by Thurrock Scout's youth membership of 1,300 (6 to 18-year-old) and 450 adult volunteers. Condovers has developed and evolved over 70 years and is key to delivering the aims of scouting. During the last 11 years a major regeneration programme has been undertaken with £250K being invested, plus an equivalent amount of voluntary skilled labour.

Most of the activities at Condovers take place outdoors and all people staying at the site use tents as sleeping accommodation. Our peak use of the site is weekends (Easter to October), weekdays (late afternoon/evenings) May to August and full time during the school summer holidays (July/August). We would normally have 7 to 10 major events each year where there would normally be more than 250 people onsite.

Public Event – East Tilbury – 26th May 2022

All the following points were openly discussed with LTC representatives during our visit to the East Tilbury event on 26th May 2022. Your representatives agreed to come back to us on the points raised but, they requested that we should include all points in our response as they were unlikely to respond until after the closure of the consultation on 20th June 2022.

Communications:

- Communication of where and when public events would be held was very late and this doesn't help individuals and organisations plan their attendance.
- We were pleased that the East Tilbury public event was added to the schedule, after the consultation had opened. However, why wasn't this included at the initial stage and why hasn't an event been scheduled in Chadwell St Mary?

Section 4 – Proposed changes since community impacts consultation:

- Figure 4.9 – Tilbury area – we were pleased that Condovers Scout Activity Centre was clearly outlined in the centre of the map showing how close it would be to the proposed LTC, this shows the potential impact to our rural location which has been training and developing young people for over 70 years.
- Section 4.4 Private recreational facilities – there is a general statement that LTC have continued to engage with landowners near the project. There has been NO engagement with Thurrock Scouts other than during public consultations, why?
- Page 135 – Land Description – Condovers Scout Activity Centre - **This is located between East and West Tilbury. It provides holiday facilities, as well as space for camping.**
    - Whist the location is true, the rest of this statement is clearly not the true scope of the activities on this site, we are **NOT** a holiday facility. Our response to the Communities Impact Consultation clearly detailed Scouting in Thurrock and that the site is used all year round by our members for their development. The Scouting in Thurrock overview has been included in this response.

Page 135 – Description of impact on the land – Condovers Scout Activity Centre - **A small section (approximately 150 square metres) of the site in the south-west corner is needed temporarily during construction for water utility connection works. The working area for the utility works is largely located outside of the site and would not affect its existing operation. The works will not impact the use of the activity centre.**

- After checking the map, we understand that the area required within the Order is the southeast corner and not the southwest. Please confirm that our understanding is correct.
- We were pleased to receive clarity on which utility was to impact our site. During the public event, the LTC representatives indicated that this would be for a foul sewer connection, please confirm.
- We requested a copy of the supporting information/risk assessment showing that the works would not impact the existing use of the site. We were informed that this is not available, could you please develop one and supply to us to support the above statement.
- We asked if access to the site would be required, the response was unclear but, there was a chance that access would be required.
- It was made clear that any access to the site would have to be arranged with Site Management and they would have to ensure that no young people were present onsite, under our duty of care for Safeguarding. Therefore, if there was a clash of requirements between Utilities and the Scouts then this would potentially impact the use of the Activity Centre.

Figure 4.9 – Tilbury area

This map clearly shows that the proposed water utilities work that were planned to take place along Church Road have now been removed. Also, there is an order limit reduction as the Utilities Logistic Hub located at the junction of Church Road and Low Street Lane is no longer required. Why is it that the temporary haul road, between Church Road and Low Street Lane is still required? During our discussions with LTC representatives they could not see any requirement for this temporary road. As mentioned in our Communities Impact consultation response, any additional junctions on the narrow country lane of Church Road leading up to the Low Street Lane railway crossing is likely to impact road safety in this area. Please confirm that this is no longer required.

Figures 4.9 & 4.49 – Proposed Tilbury Fields

During the various consultations and public events there has been various proposals on the area around the proposed route of LTC across East Tilbury Marshes. Recently, it's being proposed as the development of a public park for 'ALL' with new walking, cycling and equestrian routes. We fully understand that National Highways wants to use this as a dumping ground for treated spoil extracted from the tunnel excavation and is likely to take many years, after LTC is built (if approved) to be open to the public.

Thurrock District Scout Council (TDSC) strongly object to the current proposals because:

- Tilbury Fields is being promoted as a public park for all but, there are no provision for the public to drive to the park to use the proposed footpaths and cycle tracks.
- There are no proposed car parks and facilities, how are disabled people, wheelchair users and people with mobility scooters expected to benefit from this proposed country park.

- Earlier consultation promoted a viewing area near the control centre, this has not been detailed in recent consultations.
- The heights of the landforms have increased from 16 metres to the current 24 metres
- Having landforms raised to heights of up to 24 metres, equivalent in height to 6 storey building will have a serious impact on the outlook of our activity centre which currently enjoys clear, uninterrupted views, of the river across the marshes.

Figure 4.9 – Tilbury area Redesign of tunnel maintenance access

This map clearly shows that this change is much more than modified operational access roads for maintenance and emergency vehicles. This is likely to be a major additional junction on the LTC, which has the potential to create similar problems to the additional junctions on the Dartford Crossing, being too close to the tunnel.

Following feedback on earlier statutory consultations, a rest and service area was removed.

Thurrock District Scout Council (TDSC) strongly object to the current proposals until:

- Further information is provided on what future possible developments are being considered., even if they are only at a draft stage and would have to follow the relevant planning process.
- Who are the key stakeholders who have been involved in these discussions?
- How can we be involved in any future planning in this area?

From:	Thames Crossing Action Group
To:	Lower Thames Crossing
Cc:	"Thames Crossing Action Group"
Subject:	TCAG Inadequacies of LTC consultations representation
Date:	09 November 2022 17:46:07
Attachments:	image003.png Official - TCAG Inadequacies of LTC Consultation representation 2022.pdf

Good afternoon

Please find attached Thames Crossing Action Group's Inadequacies of LTC Consultations representation.

We understand that you are only obliged to read the Adequacy of Consultation representations made by the host Local Authorities, but would very much appreciate if you could please kindly also consider our representation, as there are very serious concerns regarding the lack of meaningful engagement and the inadequacies throughout the process.

We thank you for your time and consideration. Please do not hesitate to contact us if you need any further info or clarification.

Thanks and kind regards

Laura Blake
Chair – Thames Crossing Action Group
[redacted]
THAMES CROSSING
ACTION GROUP

THAMES CROSSING
ACTION GROUP

INADEQUACIES OF
LOWER THAMES CROSSING
CONSULTATIONS
REPRESENTATION

2022

Introduction

Our group

Thames Crossing Action Group is a community group which represents thousands of people who are strongly opposed to the proposed Lower Thames Crossing (LTC); because we have evidence to show that the £10bn+ LTC would be hugely destructive and harmful, would not meet the project objectives, and is not fit for purpose.

This representation has been prepared on behalf of the group by our Chair, Laura Blake.

Reason for submitting representation

As a group who have been fighting the proposed LTC since the very beginning we have experienced the consultation process first hand from the very beginning. In this time, we have experienced so many inadequacies, in the consultations, generally with National Highways, and of the project itself. As we detail in our representation this started as far back as the 2013 consultation and went through until National Highways first attempt to submit the LTC DCO application in Oct 2020. As we know that was withdrawn because PINS were due to refuse the application, partly we understand because of concerns over the inadequacy of consultation.

Since then it has been around 2 years, we have had two further consultations, yet nothing has improved. In fact, we and others would actually go so far as saying that the inadequacies of consultation and in general, and lack of meaningful engagement has worsened.
We therefore feel it necessary to share with the Planning Inspectorate (PINS) details of our experiences in the hope it is helpful as you consider National Highways LTC DCO application for a second time.

We did send an Inadequacies of LTC Consultation representation for the 2020 DCO application stage.[1] This latest representation includes evidence from that representation, as well as new evidence regarding the inadequacies since then.[2]

[1] [redacted]

[2] *Evidence on earlier sections of the LTC consultation process will refer to Highways England (HE) as this was a time frame before they re-branded to National Highways.*

Table of Contents

2013 DfT LTC Consultation

The beginning of the inadequate consultation process

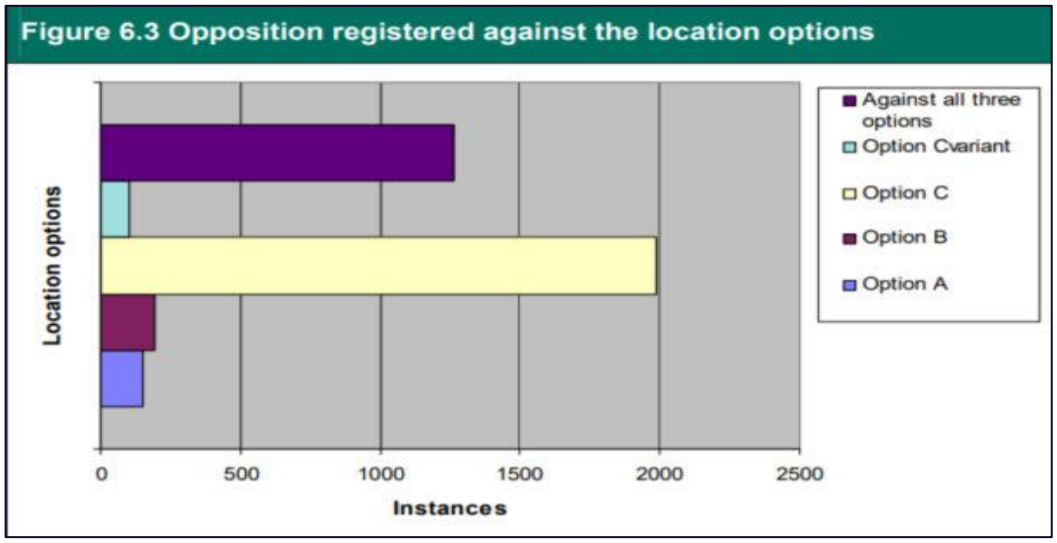
Following their 2013 public consultation to ask for views on the location of the proposed crossing the Department for Transport (DfT) published the LTC Consultation Response Summary[3]. In that Summary there are some very interesting points to bear in mind.

Most interesting to us is the fact that on Page 31 it clearly states in point 9.3
"*Again, we received a mixed reaction regarding the location options, with* **20% of all respondents expressing a preference for a new crossing at location Option A***, 5% preferring Option B,* **17% preferring either Option C or C variant**, *and 26% expressing a preference for another location.* **Option A was preferred by most individual respondents and Options C and C variant were most popular with those responding on behalf of organisations.**"

Remember location Option A covered many variants around a similar location to the current Dartford Crossing, location Option C had many variants all in a similar location to where they have now chosen the preferred route Option C3. They clearly state that "***Option A was preferred by most individual respondents and Options C and C variant were most popular with those responding on behalf of organisations***" (most likely businesses).

So this tells us that as far back as 2013 the most favoured location option overall was the residents choice of location Option A, and one of the least favoured was location Option C.

3 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/321116/consultation-response-summary.pdf



Highways England (HE) were then asked by the Government to hold a further consultation in 2016 to assess the economic, traffic, environmental and community impacts for locations A and C.

2016 LTC Consultation

The below contains the concerns around the conduct and credibility of the Lower Thames Crossing (LTC) consultation held by Highways England (HE) in 2016.

It is our belief that the consultation was manipulated to favour the route preferred by HE, as they omitted detail that would support the alternative.

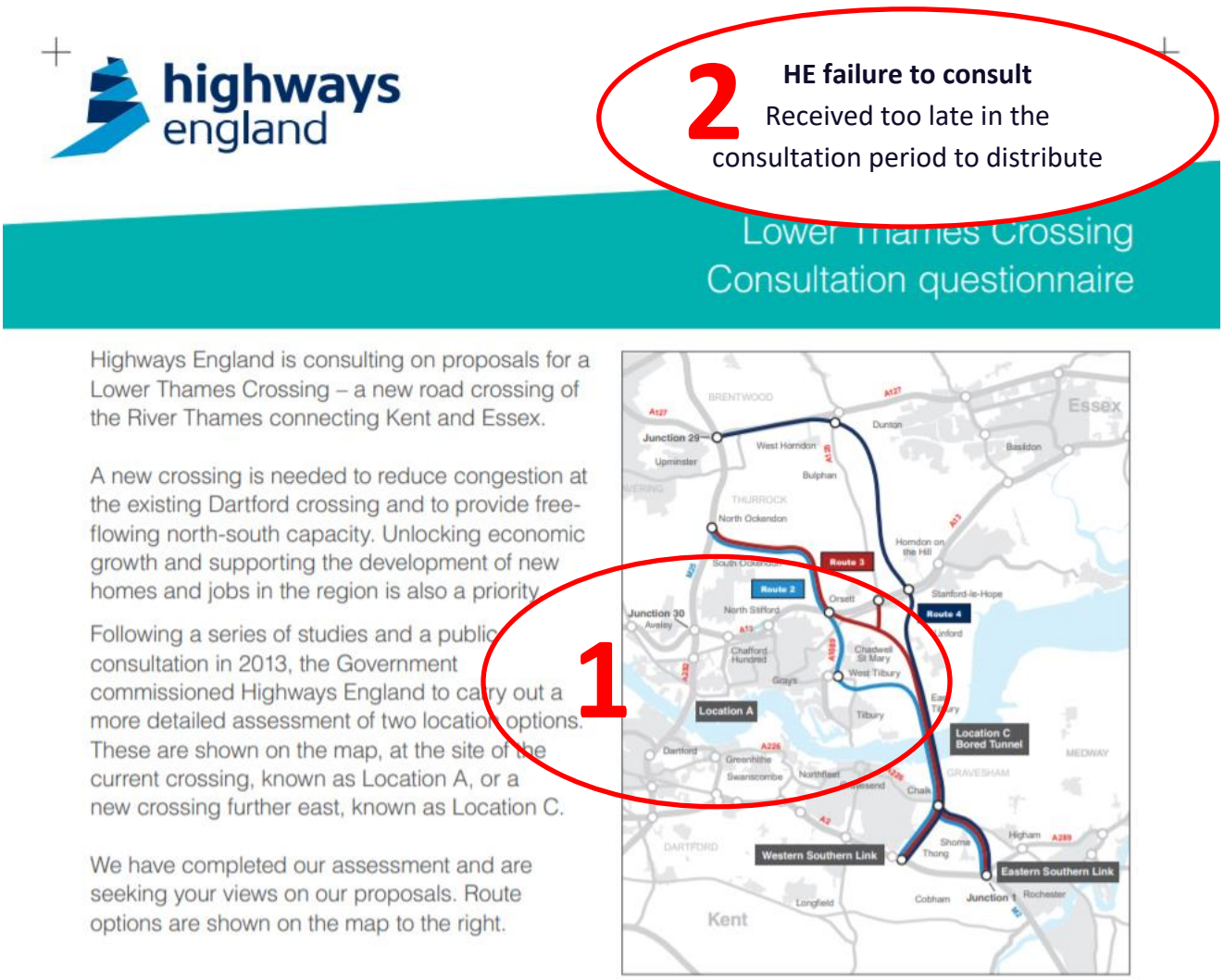
We also note that HE informed DartCharge users about the consultation, which we feel yet again creates bias in HE's favour. Many DartCharge users will just be aware they pay to get stuck in traffic at the Dartford Crossing and will think any other new crossing has to be better, without any real consideration or research.

Consultation Questionnaire

According to HE the consultation was an opportunity for members of the community to have their say on the routes being proposed. The whole process was manipulated to favour and push people to favour the Option C route. Points highlighted in red and detailed below. Inserted images taken from the official 2016 Consultation Questionnaire. [4]

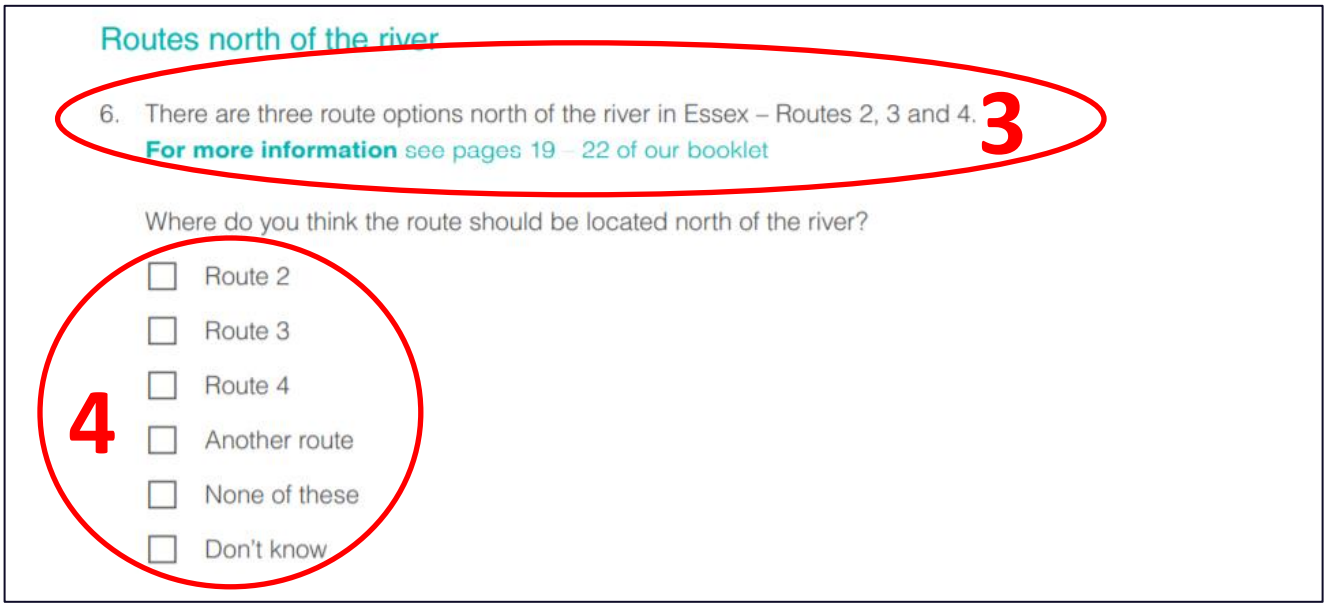
1. No map or route detail on the front cover of the brochure, even though in the paragraph of text adjacent it says they are consulting on Location A as well as Location C.

[4] [redacted]



2. Highways England did not send enough consultation booklets to the borough and Thurrock council made multiple formal complaints during the consultation and requested more booklets. Most arrived after the consultation finished.

3. They mention 3 routes, but there were actually 4 if you include Location A, which they should have but didn't consult on this option.



Routes north of the river

6. There are three route options north of the river in Essex – Routes 2, 3 and 4.
For more information see pages 19 – 22 of our booklet

3

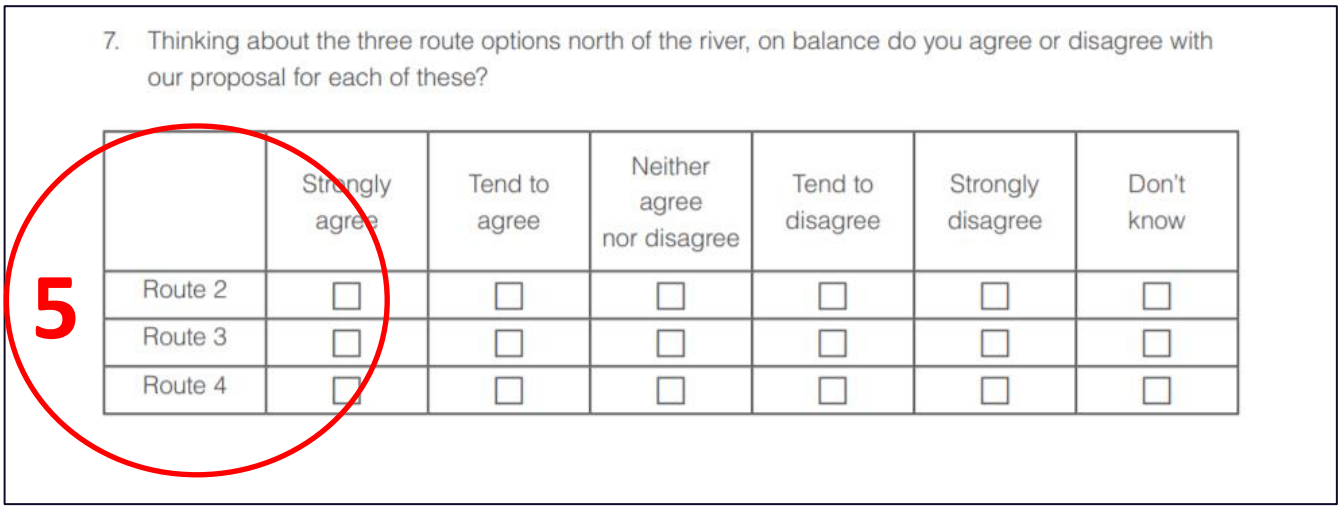
Where do you think the route should be located north of the river?

- ☐ Route 2
- ☐ Route 3
- ☐ Route 4
- ☐ Another route
- ☐ None of these
- ☐ Don't know

4

4. No mention of Location A and only asking for feedback on Location C. In addition, the option 'Don't Know' should not be included as this can have a material impact on the % outcome of the question.

5. Another question that does not seek feedback on Location A only the options within Location C

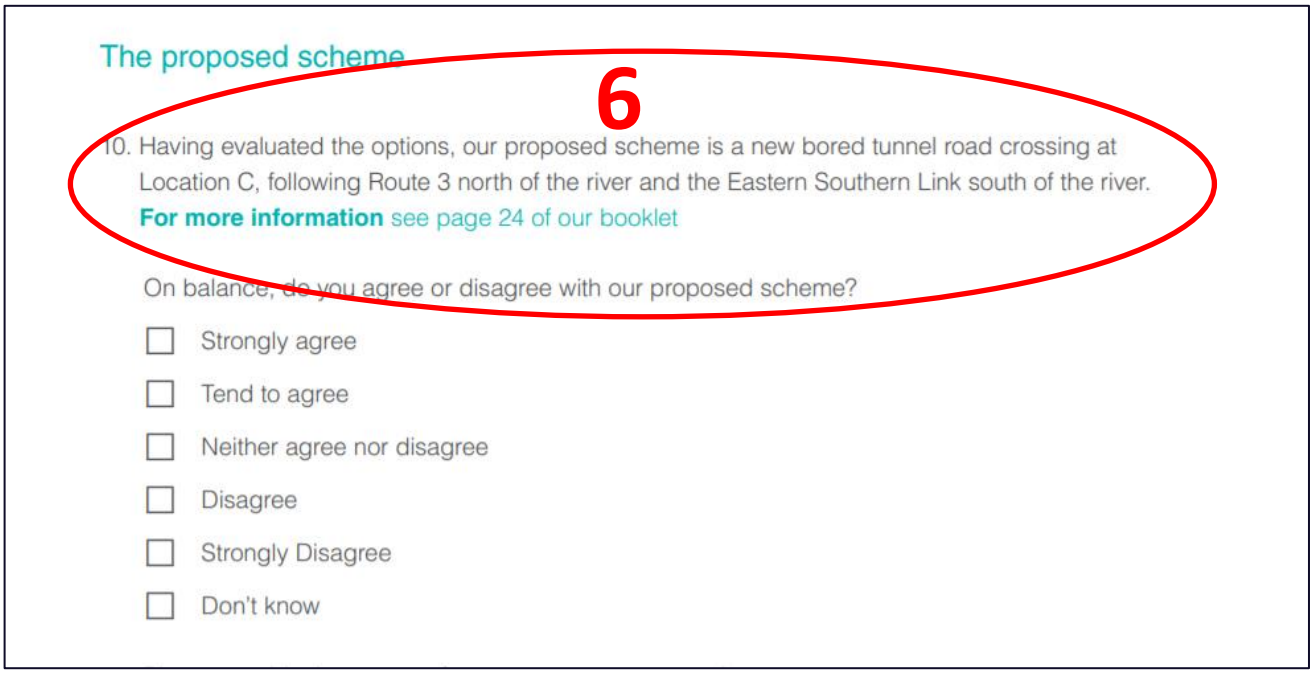


7. Thinking about the three route options north of the river, on balance do you agree or disagree with our proposal for each of these?

	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
Route 2	☐	☐	☐	☐	☐	☐
Route 3	☐	☐	☐	☐	☐	☐
Route 4	☐	☐	☐	☐	☐	☐

5

6. HE already established this was their favoured route and was very overt is discussing this, which could have influenced people not furnished with all the information to agree with the so called experts.



Consultation Confusion

HE began the consultation informing residents and council that Location A was not on the table or being taken forward, causing a huge amount of confusion.

At the consultation events held across the borough and with local businesses, HE only had large scale maps of the routes at Location C, none at Location A.

Again showing the bias towards Location C and manipulating the process to get people to favour this route.

In addition, it took the Transport Secretary Andrew Jones to confirm that Location A was still being consulted on, halfway through the consultation.

Highways England's Consultation Toolkit stated: "*Location A will not be taken forward and therefore this option is not included in the public consultation.*"

Road's Minister Andrew Jones: "*I can confirm that Option A is included within the consultation and remains an option for consideration.*"

In the HE Consultation Publicity Toolkit, which was issued to all Highways England staff and agency personnel involved with advising the public at the Consultation Publicity Events, it included the following in the FAQ section:

Q2: Why are you not consulting on a route option at Location A?

A: In summary, Highways England's assessment has shown that a crossing at location A would not solve the traffic problems at Dartford and would do little for the economy. Location C, by contrast, provides double the wide economic benefits of Option A, and provides a clear alternative route to the Dartford Crossing, reducing congestion there and improving the resilience of the road network as a whole. In light of these findings Highways England have concluded that a route option at Location A will not be taken forward and therefore this option is not included in the public consultation.

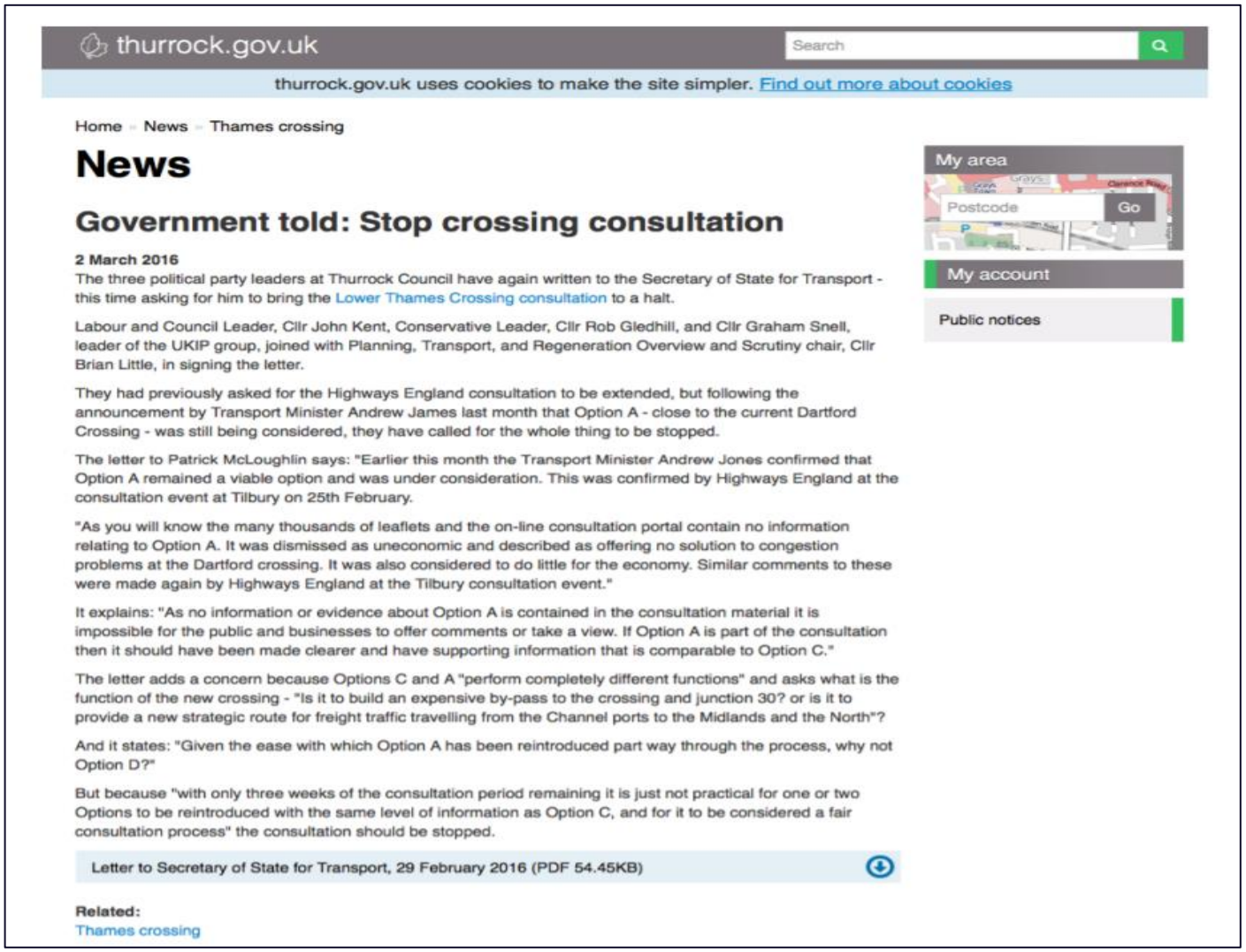
The Government later confirmed that Location A at Dartford was in fact included in the consultation. However, this was several weeks into the consultation period, and this important change of tack was not conveyed to the 1.2 million individuals and organisations who had been invited to respond to the consultation.

In any event, it was too late for those individuals who had already responded.

It also does not change the fact that there were no questions about Location A.

In view of this irreconcilable conflict of important information, and the clearly incorrect guidance given to consultees by HE, we consider that the consultation was fundamentally flawed.

Detailed below is the official response to this from Thurrock Council.
https://www.thurrock.gov.uk/news/thames-crossing/government-told-stop-crossing-consultation



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News

Government told: Stop crossing consultation

2 March 2016

The three political party leaders at Thurrock Council have again written to the Secretary of State for Transport - this time asking for him to bring the Lower Thames Crossing consultation to a halt.

Labour and Council Leader, Cllr John Kent, Conservative Leader, Cllr Rob Gledhill, and Cllr Graham Snell, leader of the UKIP group, joined with Planning, Transport, and Regeneration Overview and Scrutiny chair, Cllr Brian Little, in signing the letter.

They had previously asked for the Highways England consultation to be extended, but following the announcement by Transport Minister Andrew James last month that Option A - close to the current Dartford Crossing - was still being considered, they have called for the whole thing to be stopped.

The letter to Patrick McLoughlin says: "Earlier this month the Transport Minister Andrew Jones confirmed that Option A remained a viable option and was under consideration. This was confirmed by Highways England at the consultation event at Tilbury on 25th February.

"As you will know the many thousands of leaflets and the on-line consultation portal contain no information relating to Option A. It was dismissed as uneconomic and described as offering no solution to congestion problems at the Dartford crossing. It was also considered to do little for the economy. Similar comments to these were made again by Highways England at the Tilbury consultation event."

It explains: "As no information or evidence about Option A is contained in the consultation material it is impossible for the public and businesses to offer comments or take a view. If Option A is part of the consultation then it should have been made clearer and have supporting information that is comparable to Option C."

The letter adds a concern because Options C and A "perform completely different functions" and asks what is the function of the new crossing - "Is it to build an expensive by-pass to the crossing and junction 30? or is it to provide a new strategic route for freight traffic travelling from the Channel ports to the Midlands and the North"?

And it states: "Given the ease with which Option A has been reintroduced part way through the process, why not Option D?"

But because "with only three weeks of the consultation period remaining it is just not practical for one or two Options to be reintroduced with the same level of information as Option C, and for it to be considered a fair consultation process" the consultation should be stopped.

Letter to Secretary of State for Transport, 29 February 2016 (PDF 54.45KB)

Related:
Thames crossing

My area

Postcode Go

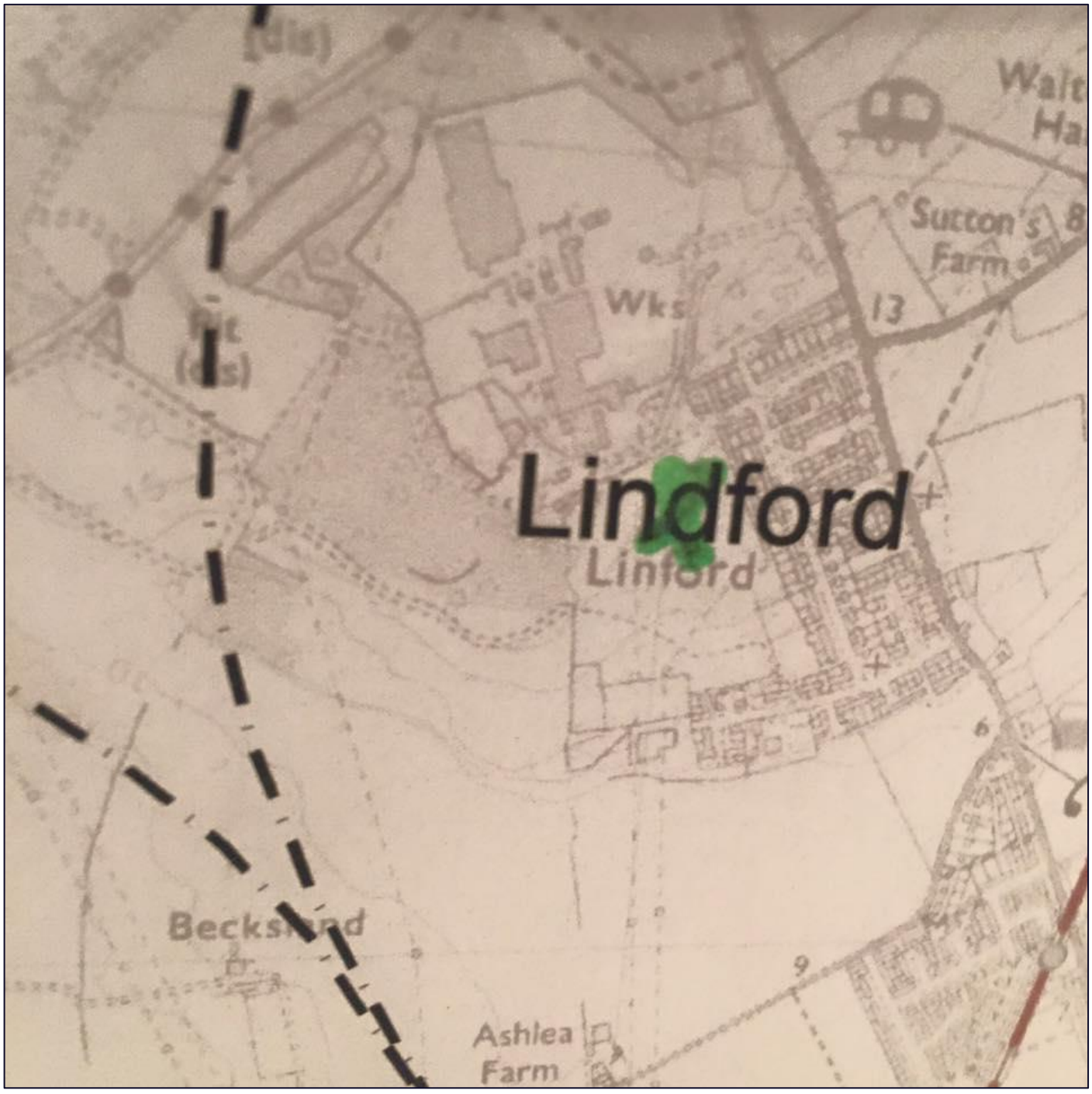
My account

Public notices

Consultation Events issues

HE were not at all prepared for the public consultation events in 2016. For example at the event that took place on Feb 3rd at Orsett Hall Hotel, which ran from 11am – 7pm. HE ran out of consultation response forms in the morning. There were large queues all day, with people waiting over an hour to even get in. Later in the day police were called, and residents were being turned away, and not even allowed to join the queue because the event would have ended before they reached the front of the queue. By 8pm they were asking people to leave. This most definitely was not an adequate consultation event.

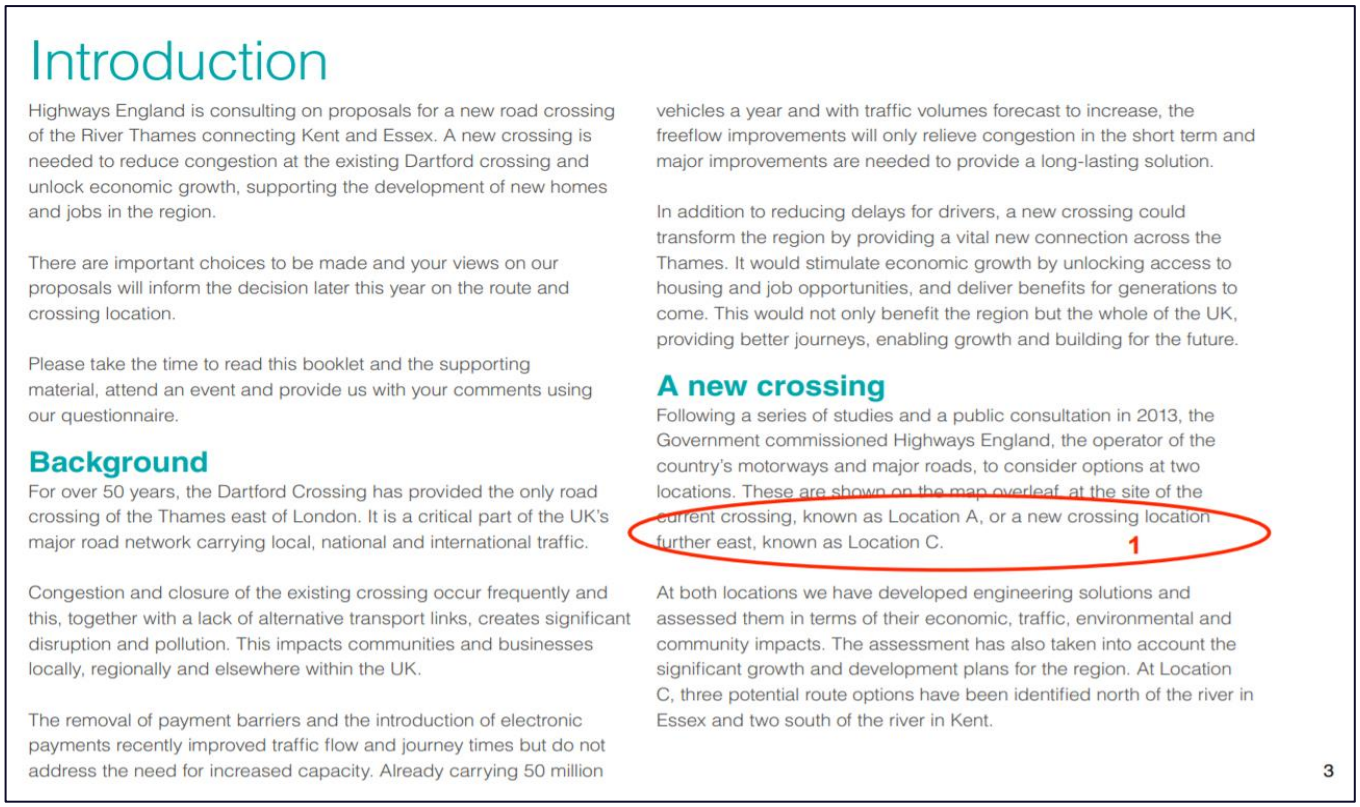
They consultation materials were not adequate either, with errors like spelling Linford incorrectly on maps, despite the fact they had added it just above the Ordnance Survey map labelling which was correctly spelt.


Lindford
Linford
Sutton's Farm
Wks
13
Ashlea Farm
9

Consultation Booklet

Inserted images taken from the official 2016 Consultation Booklet [5]

1. Location A mentioned here in the introduction but again on page 4, not route is shown on the diagram.



Introduction

Highways England is consulting on proposals for a new road crossing of the River Thames connecting Kent and Essex. A new crossing is needed to reduce congestion at the existing Dartford crossing and unlock economic growth, supporting the development of new homes and jobs in the region.

There are important choices to be made and your views on our proposals will inform the decision later this year on the route and crossing location.

Please take the time to read this booklet and the supporting material, attend an event and provide us with your comments using our questionnaire.

Background

For over 50 years, the Dartford Crossing has provided the only road crossing of the Thames east of London. It is a critical part of the UK's major road network carrying local, national and international traffic.

Congestion and closure of the existing crossing occur frequently and this, together with a lack of alternative transport links, creates significant disruption and pollution. This impacts communities and businesses locally, regionally and elsewhere within the UK.

The removal of payment barriers and the introduction of electronic payments recently improved traffic flow and journey times but do not address the need for increased capacity. Already carrying 50 million vehicles a year and with traffic volumes forecast to increase, the freeflow improvements will only relieve congestion in the short term and major improvements are needed to provide a long-lasting solution.

In addition to reducing delays for drivers, a new crossing could transform the region by providing a vital new connection across the Thames. It would stimulate economic growth by unlocking access to housing and job opportunities, and deliver benefits for generations to come. This would not only benefit the region but the whole of the UK, providing better journeys, enabling growth and building for the future.

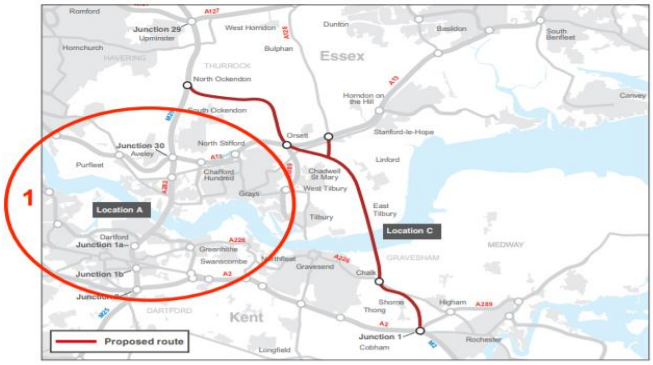
A new crossing

Following a series of studies and a public consultation in 2013, the Government commissioned Highways England, the operator of the country's motorways and major roads, to consider options at two locations. These are shown on the map overleaf, at the site of the current crossing, known as Location A, or a new crossing location further east, known as Location C. 1

At both locations we have developed engineering solutions and assessed them in terms of their economic, traffic, environmental and community impacts. The assessment has also taken into account the significant growth and development plans for the region. At Location C, three potential route options have been identified north of the river in Essex and two south of the river in Kent.

3

[5] [redacted]



Our proposal

We have completed our evaluation and are recommending a new road crossing through a bored tunnel at Location C.

Our proposed scheme would be a dual carriageway connecting junction 1 of the M2 to the M25 between junctions 29 and 30. This crosses under the River Thames just east of Gravesend and Tilbury. Of our potential options, this route would provide a 70mph motorway-to-motorway connection with the greatest improvement in journey times and a modern, high quality road along its entire length.

In addition to easing congestion and providing an alternative to the existing crossing, a new road and crossing at Location C would also offer wider economic benefits. Our economic assessment indicates that it could add over £7 billion to the economy by stimulating investment and business opportunities, and create over 5,000 new jobs nationally.

Estimated costs are between £4.3 and £5.9 billion (including allowances for inflation). User charges would be applied, in line with current government policy. Subject to the necessary funding and planning approvals, we anticipate that the new crossing would be open in 2025, if publicly funded. If private funding is also used to meet the costs of the project, we anticipate the crossing being open by 2027.

Have your say

This is your opportunity to give your views on our proposals. In this booklet you will find a summary of these proposals, where to find further information and how to access our consultation questionnaire. See section six for details on how to respond.

Please get involved and provide your responses by 24 March 2016.

What happens next

We will review the responses and report our findings and conclusions to the Department for Transport. Your views will help us to inform the Government prior to its decision on the location, route and type of crossing.

4

2. None of the traffic modelling or studies showed what impact the 3 crossings further into London, all of which the Government are supporting, will have on the Dartford Crossing. These will only have a positive impact on the crossing and omitting this information is deceptive. They say it would not provide a significant improvement but do not substantiate with data.

East London river crossing proposals

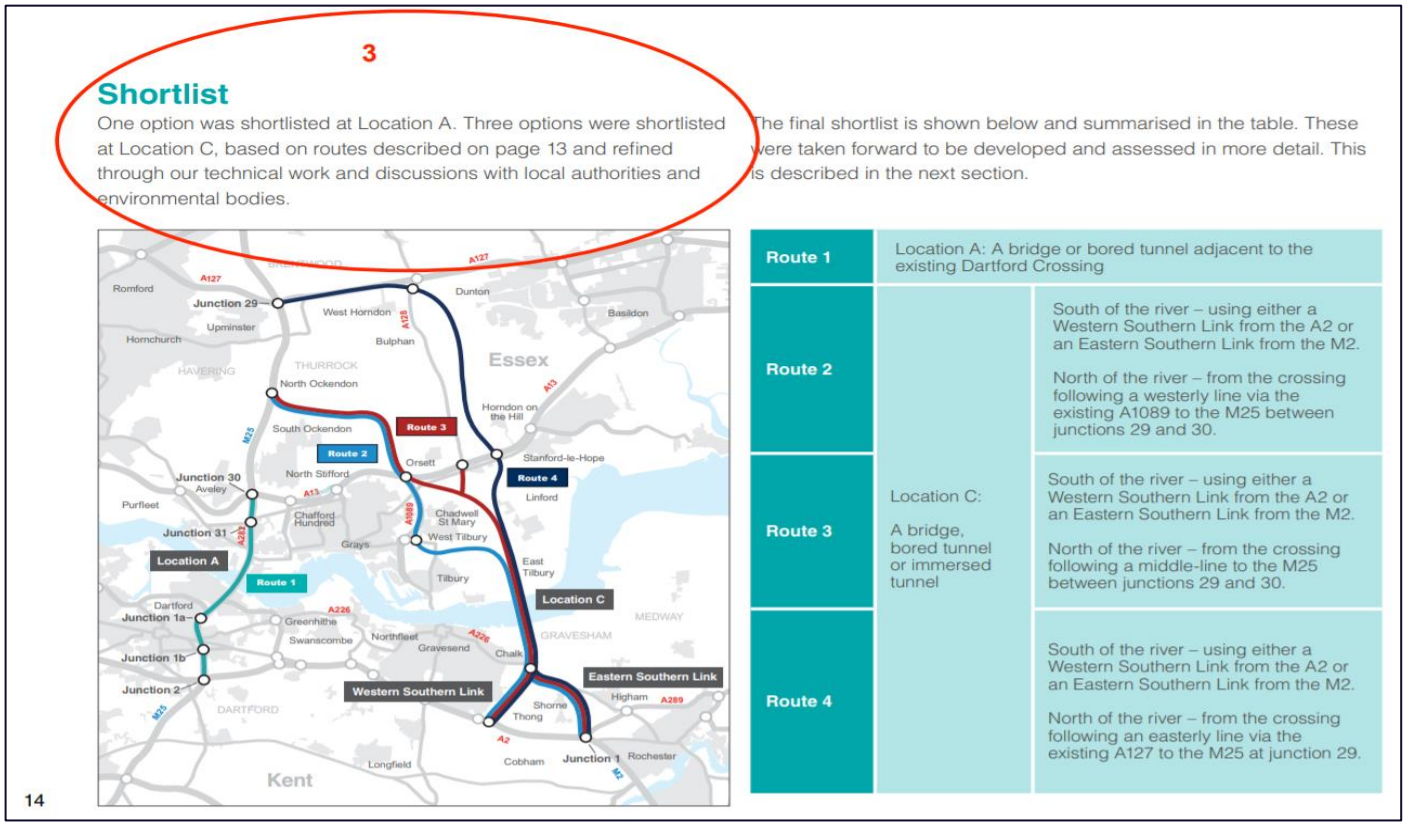
Transport for London is developing proposals for up to three additional river crossings in East London, which are shown on the image above. The first of these would be the Silvertown Tunnel which could be open for traffic in 2022/2023. Additional crossings at Gallions Reach and Belvedere are also being considered for opening in 2025.

While these would reduce congestion and improve the reliability and resilience of the local road network within London, they would not provide significant improvement at the Dartford Crossing.

We are working with Transport for London to ensure that all new river crossing proposals take each other into account.

8

3. Here HE show that location A is being taken forward and shortlisted but did not consult on the route.



3

Shortlist

One option was shortlisted at Location A. Three options were shortlisted at Location C, based on routes described on page 13 and refined through our technical work and discussions with local authorities and environmental bodies.

The final shortlist is shown below and summarised in the table. These were taken forward to be developed and assessed in more detail. This is described in the next section.

Route 1	Location A: A bridge or bored tunnel adjacent to the existing Dartford Crossing	
Route 2	Location C: A bridge, bored tunnel or immersed tunnel	South of the river – using either a Western Southern Link from the A2 or an Eastern Southern Link from the M2. North of the river – from the crossing following a westerly line via the existing A1089 to the M25 between junctions 29 and 30.
Route 3		South of the river – using either a Western Southern Link from the A2 or an Eastern Southern Link from the M2. North of the river – from the crossing following a middle-line to the M25 between junctions 29 and 30.
Route 4		South of the river – using either a Western Southern Link from the A2 or an Eastern Southern Link from the M2. North of the river – from the crossing following an easterly line via the existing A127 to the M25 at junction 29.

14

4. No benefits of Location A are mentioned here only negatives. Not a fair appraisal.

Positives included in the Lower Thames Crossing Consultation Summary Business Case[6]

2.7.2 A new crossing at Location A could increase crossing capacity by 60% in the opening year and would deliver journey time benefits of up to 5 mins between Junction 3 and Junction 28 on the M25.

2.7.3 From an ecological perspective, a crossing at Location A would likely have a lower impact on protected habitats and species than a crossing at Location C

As you can see there are positives to the route that if consulted on properly and fairly could of given a completely different response to the consultation.

[6] [redacted]

Appraisal of the shortlist

In assessing the shortlist there have been three main considerations:

- **Location** – whether a new crossing should be built at Location A, close to the existing crossing, or at Location C, east of Gravesend and Tilbury.
- **The crossing** – whether the crossing structure should be a bridge or a tunnel.
- **Routes and junctions** – how to strike a balance of environmental factors, local access and highway design standards.

To assess the shortlist we have:

- carried out computer modelling of forecast traffic flows, taking into account planned housing and commercial developments
- developed engineering designs of feasible crossing types
- designed preliminary alignments for highways and junctions
- considered the impact on people and property
- identified the environmental and ecological impacts both long term and during construction
- estimated the costs and benefits to quantify the value for money that each route offers

16

Location

A new crossing at Location A (Route 1) performs poorly against the traffic related scheme objectives. As Location A does not provide an alternative route, traffic would still be funnelled through the existing corridor from junctions 2 to 29 and incidents at Dartford would potentially still cause long delays and severe congestion on local roads.

Route 1 would not provide additional connections to local roads and by attracting more traffic to the existing corridor, congestion on the adjacent A2 and A13 would also increase.

4 Construction would take at least six years and would cause considerable disruption to traffic using the existing Dartford Crossing with 40mph average speed restrictions and complex traffic management affecting millions of journeys. Even when the scheme is complete, there would be limited improvement for drivers as the current 50mph speed limit and closely spaced junctions would remain.

Additionally, a crossing at Location A would offer poor value for money in comparison to Location C and would perform poorly against other scheme objectives such as safety, noise and air quality.

A new crossing at Location C would provide a high quality, safer transport solution with a 70mph road providing improved journeys. Crossing capacity would increase by 70% in the opening year and, as a new route, it could be constructed without impacting the already congested Dartford corridor.

5. No comparison done for Location A on community and environmental factors

Comparison of community and environmental factors 5

	North of river			South of river	
Feature	**Route 2**	**Route 3**	**Route 4**	**Western Southern Link**	**Eastern Southern Link**
Air quality	Limited impact on air quality immediately adjacent to the routes but improved air quality at Dartford.			Limited impact on air quality immediately adjacent to the routes but improved air quality at Dartford.	
Noise	All routes reduce noise disturbance for properties close to the existing Dartford Crossing.			Reduced noise disturbance for properties close to the existing Dartford Crossing. There is little to differentiate between the Eastern and Western Southern Links in terms of noise.	
	Has the greatest impact in terms of noise disturbance as the route is closer to more densely populated areas.	Noise disturbance is less than Route 2 but greater than Route 4.	Has the least impact in terms of noise disturbance as the route is further away from urban centres.		
Biodiversity	Routes 2 and 3 have lower impacts on ecological sites than Route 4.		Greatest impact on ecological sites.	Affects Claylane Wood ancient woodland and Shorne and Ashenbank Woods SSSI**. Less overall effect of the two options.	Affects areas of ancient woodland and local wildlife sites east of Shorne and Great Crabbles Wood SSSI**.
Landscape	Routes 2 and 3 run through greenbelt in Thurrock.		Route 4 runs through greenbelt in Thurrock and Brentwood.	Lesser area required within the Kent Downs AONB***.	Greater area required within the Kent Downs AONB***.
Cultural heritage	Requires land within West Tilbury conservation area and scheduled monuments. Potential impact on listed buildings.	Requires land within a scheduled monument. Potential impact on listed buildings. Avoids conservation areas. Has the least impact of Routes 2, 3 and 4.	Runs through Thorndon Park, a Registered Park and Garden and conservation area. Potential impact on listed buildings.	Potentially impacts the setting of listed buildings. Route is close to but not in the conservation area of Thong.	Potentially impacts the setting of listed buildings. Route is close to but not in the conservation area of Shorne.
Properties*	9 residential 3 agricultural	14 residential 22 traveller plots 3 agricultural	14 residential 9 commercial 3 agricultural	4 residential 3 commercial	10 residential 2 commercial

*Properties which may require demolition, based on preliminary illustrative route design **SSSI = Site of Special Scientific Interest ***AONB = Area of Outstanding Natural Beauty

21

6. No comparison done for Location A on cost, benefits or journey times

Comparison of costs, benefits and reductions in journey time

6

Features	Western Southern Link with		
	Route 2	Route 3	Route 4
Estimated cost (nominal)	£4.1 - £5.8 billion	£4.1 - £5.7 billion	£4.4 - £6.2 billion
Adjusted benefit cost ratio*	3.1-2.2	3.1-2.2	2.9-2.1
Value for money*	High	High	High
Reduction in journey time between junctions 3 and 28 on M25 using the Dartford Crossing	3 mins southbound, 4.5 mins northbound	3 mins southbound, 4.5 mins northbound	3 mins southbound, 5 mins northbound
Reduction in journey time between M2 junction 4 and M25 junction 28 using new crossing at C	9 mins	10 mins	9 mins
Route length	13.8 miles	13.3 miles	15.9 miles

Features	Eastern Southern Link with		
	Route 2	Route 3	Route 4
Estimated cost (nominal)	£4.3 - £6.0 billion	£4.3 - £5.9 billion	£4.6 - £6.4 billion
Adjusted benefit cost ratio*	3.3-2.4	3.4-2.5	3.1-2.2
Value for money*	High	High	High
Reduction in journey time between junctions 3 and 28 on M25 using the Dartford Crossing	3 mins southbound, 4.5 mins northbound	3 mins southbound, 4.5 mins northbound	3 mins southbound, 5 mins northbound
Reduction in journey time between M2 junction 4 and M25 junction 28 using new crossing at C	11 mins	12 mins	11 mins
Route length	14.7 miles	14.2 miles	16.8 miles

22

*To Department for Transport and Government guidelines

7. Not a fair consultation if you are influencing which route to choose and not substantiated with data as above

Have your say

Having taken into account the existing conditions, the nature of the problems at Dartford and the needs and plans for the area, we are proposing a scheme which, in our view, best matches the objectives and balances the needs of road users, the community, the environment and business.

There are important choices to be made. Through this consultation we are inviting you to provide your views and comments on our proposals. Your views will be taken into consideration before a final decision is made by the Government later this year.

In summary, our assessment has shown that a crossing at Location A would not solve the traffic problem at Dartford and would do little for the economy locally, regionally or nationally. Our proposal is a bored tunnel crossing at Location C, east of Gravesend and Tilbury. 7

We have developed three routes north of the river and two routes south of the river which meet the scheme objectives and on which we are seeking your views. 8

North of the river - Essex

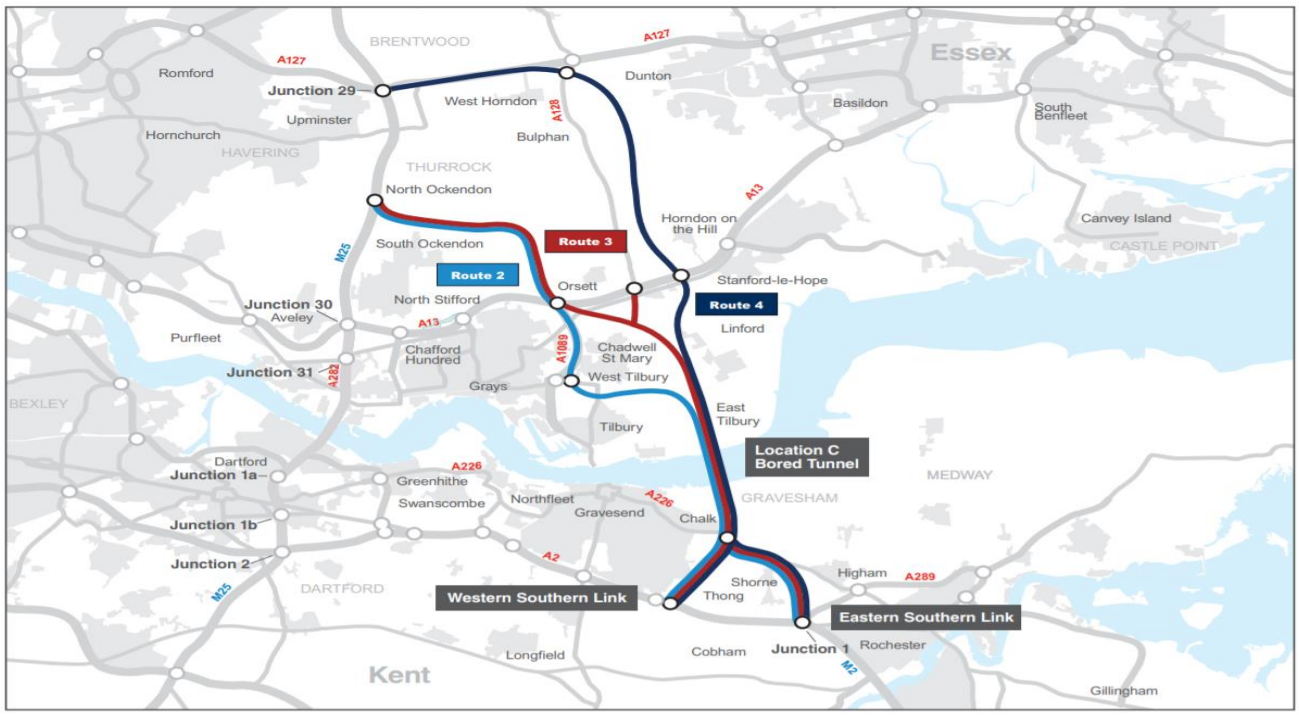
There are three routes to be considered. Each has potential to unlock opportunities for housing and jobs and all offer high value for money. They each meet the transport objectives, although they offer different opportunities to connect with local roads. While there are important differences in the local and environmental impacts of each option, we consider all of these options to be viable.

South of the river - Kent

There are two routes and we consider both of these to be viable. The Eastern Southern Link is a more direct, motorway-to-motorway connection and as a result better meets the economic and transport objectives. It has greater community and environmental impacts. The Western Southern Link has a lower community and environmental impact but, as a less direct route with a lower speed junction on the A2, it is weaker against the economic and transport objectives.

28

8. Again only mention of 3 routes for people to have their say on, not 4 including Location A.
9. And yet again no mention of Location A on the map in such a prominent position as on the Have Your Say section.



29

Community Factors

Copied below is the community impacts of the routes within option C. These are completely deceptive to show that the route is not as destructive as it will be.

E.g. Thames Crossing Action Group were aware of 24 homes in an estate in Orsett alone who had all been served blight notices yet HE state that only 14 residential properties were at risk along the ENTIRE ROUTE.

TABLE 2.3 - COMPARISON OF COMMUNITY AND ENVIRONMENTAL FACTORS NORTH OF THE RIVER

Feature	Route 2	Route 3	Route 4
Air Quality	Limited impact on air quality immediately adjacent to the routes but improved air quality at Dartford		
Noise	All routes reduce noise disturbance for properties close to the existing Dartford Crossing		
	Has the greatest impact in terms of noise disturbance as the route is closer to more densely populated areas.	Noise disturbance is less than Route 2 but greater than Route 4.	Has the least impact in terms of noise disturbance as the route is further away from urban areas.
Biodiversity	Routes 2 and 3 have lower impacts on ecological sites than Route 4.		Greatest Impact on ecological sites.
Landscape	Routes 2 and 3 run through greenbelt in Thurrock.		Route 4 runs through greenbelt in Thurrock and Brentwood.
Cultural Heritage	Requires land within West Tilbury conservation area and scheduled monuments. Potential impact on listed buildings.	Requires land within a scheduled monument. Potential impact on listed buildings. Avoids conservation areas. Has the least impact of Routes 2, 3 and 4.	Runs through Thorndon Park, a Registered Park and Garden and conservation area. Potential impact on listed buildings.
Impacts on Property[2]	9 residential 3 agricultural	14 residential 22 traveler plots 3 agricultural	14 residential 9 commercial 3 agricultural

Distortion of the Consultation Results

The IPSOS MORI report[7] has been distorted to 'support' Highways England's preferred outcome. The responses from 1,358 individual Gravesham residents opposed to the crossing have been discounted from 'members of the public' and allocated to 4 'special interest' groups.
This included:

- Gravesham Says No – 229 responses
- Shorne (erroneously identified as Higham) Parish Council – 946 responses

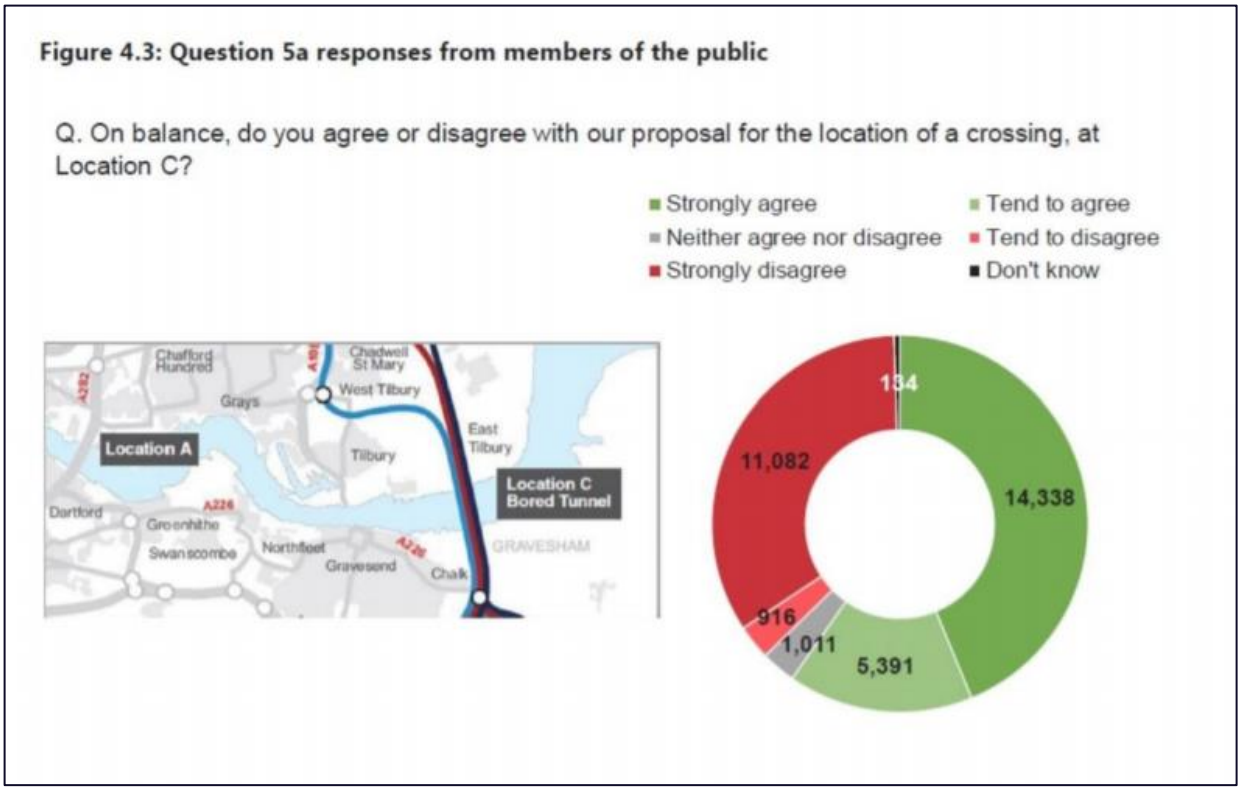
[7] [redacted]

- Adam Holloway – 42 responses
- Higham Object to Option C – 141 responses

A further 6,257 individuals from the Thurrock area were discounted as members of the public and allocated to 6 groups, and 5,625 members of the Woodlands Trust were counted as one organisation.

If these 13,240 individuals were counted as members of the public, this would have made a massive difference to the results.

For example, in question 5a "On balance, do you agree or disagree with our proposal for the location of a crossing, at Location C", Ipsos MORI has reported that a total of 19,729 either agreed or strongly agreed, against a total of 11,988 who disagreed or strongly disagreed. If these 'votes' had been included, the total number of members of the public who disagreed would have increased to 25,238.



Benefit Cost Ratio

Boris Johnson signed the Paris Climate Agreement, ratifying it on behalf of the UK. This commits the UK to cut its CO2 emissions from 500 tons to 120m tons a year by 2050, and down to less than 20m tons by the end of the century. You would have thought this would mean that CO2 emissions would

be an important factor when choosing a route, wouldn't you? Highways England's benefit cost ratios (BCRs) show that Route 1 (Option A) at Dartford will generate additional CO2 costed at £144m (2010 prices). Route 3 ESL (HE's preferred option) will generate additional CO2 costed at £288m. So Route 3 ESL will produce twice the amount of additional CO2 emissions than Option A at Dartford. I'm not quite sure how you can put a monetary value on extra road accidents, but Route 1 (Option A) at Dartford will cost an extra £74 million, while Route 3 will cost an extra £120m. So clearly, a crossing east of Gravesend will generate twice as much extra CO2 and 60% more serious accidents than an extra crossing at Dartford. But don't worry – the cost of these increased emissions and increased accidents on Option C is more than compensated by the benefits to Business (only a paltry £1.6bn for Dartford but a whopping £3.4bn if Route 3 ESL is chosen). Strangely, although a new bridge at Dartford was by far the cheapest option in 2013, and offered the best value for money in terms of Benefit Cost Ratios (BCR), it is noticeable that the cost of this relatively simple option increased by 170% between 2013 and 2016, making it much less attractive. Conversely, the BCRs for a new crossing east of Gravesend doubled between 2013 and 2016. The Treasury is now being presented with an entirely different business case on which to base its decision. At the very least, we would have thought this needs investigation before deciding to spend £5bn of public money as it was at that time.

Petition

As you will see below HE, did not take into account the significant official petition that opposed Option C. This gathered 31,408 signatures and was not taken into account.

The 17 reasons Thurrock Council oppose the consultation and routes of Option C

1. The traffic movement data on which the appraisal partly relies is historic - 2001 demand data. It is the foundation of the Highways England (HE) decision making yet there have been significant new developments in the sub-region over the last decade, and trip making patterns have changed as a result.

2. Route 3 has a slightly higher benefit to cost ratio, but there is no clear headway between options. Benefit to Cost ratios at lower end do not include wider economic benefits but the upper end does.
3. For the Highways England's preferred route (Route 3) these are 2.3 (lower) and 3.4 (upper). For every £1 invested HE claim a return of £2.30 - but this return is made up substantially of time savings arising from traffic on the new route. Given there are significant questions over the accuracy of the

data from 2001, there must be questions over the accuracy of the modelling and therefore the travel time savings, and hence over the accuracy of the benefits.

4. Route corridors A and C fulfil substantially different strategic functions. Location C is likely to be less effective in alleviating congestion at Dartford Crossing than location A.

5. If a new crossing is built at location C, when incidents occur on the Dartford Crossing, there is no evidence that the local road network can cope with traffic diverting from the Dartford Crossing to the Lower Thames Crossing. Highways England's preferred option may cause worse community and environmental problems over the wide area, particularly on the key roads of the A13 and A2 when diverting traffic hits bottlenecks.

6. Any gridlock will worsen pollution in the area in increased emissions from vehicles and the number of vehicles. The future modelled scenario has an increased traffic movement from 140,000 vehicles a day now with the existing crossing to nearly 240,000 a day in total by 2041.

7. At the existing crossing traffic volumes in 2025 are predicted to be around 14% lower than a scenario without a new crossing. By 2041 they are predicated to be just 7% lower. This suggests that location C options have very limited benefits in terms of the main objective ' to relieve the congested Dartford Crossing and approach roads'. In consequence, there is unlikely to be a significant long-term difference to general traffic conditions at the existing crossing.

8. The detailed information available to Highways England is yet to be published. There is a lack of information to make an informed decision over any route and the strategic case tests have not been met. More information is specifically required on wider traffic flows and impacts on junctions.

9. The need for a new crossing has not been demonstrated. Further work is required to explore alternative modes of travel. More freight could go by rail. It is not shown how the options could support sustainable travel and land use integration as set out in Government Guidance.

10. The environmental harm caused by the scheme has not been fully assessed or quantified, including the impacts on health and local amenity and this may not be out-weighed by any economic or transport benefits - clearly further work is required on air quality and public health before the Government makes a decision. It must be given weight alongside economic and transport benefits.

11. As Option 1 within Corridor A has been reintroduced, after the consultation has started, a full ' like for like' assessment should be provided.

12. The public interest 'compelling case' required for Compulsory Purchase Orders has not yet been met.

13. The consultation has been flawed, with inadequate comparative information, inadequate capacity at venues, and inadequate hard copy consultation materials. The consultation should be at least extended but preferably halted to allow further work.

14. The Council has written two letters to the Secretary of State for Transport to this effect, but has yet to receive a reply. It has also not received a response to its letter to the Chancellor of the Exchequer.

15. What is needed is a full strategic road network and local access road review to maintain resilience over the next 10 years.

16. The Council requests that joint work be instigated by Thurrock Council, the Department for Transport, and Highways England on the effect of pollution from vehicles on the health of residents.

17. Should Government insist on progressing a LTC option after the consultation that Thurrock Council should have a seat around the table to help protect residents and businesses from the least - worst option.

The Alternative

It is our belief that the Option deemed Location A Option 14 (a environmental tunnel going from J2 on the M25 to a new between Junction 30-29) warrants further consultation and evaluation.

The benefit table shows the assessment merits and clearly show the impact on the wider community is drastically reduced and the reduction in traffic at the current crossing will jump from 14% (*correct figure in 2016*) Option C to 40% Option A14.

With the Borough of Thurrock already deemed to have illegally high pollution levels the ambition should be to reduce this rather than increase it, regardless of cost.

The rationale that HE used to omit A14 was cost but the table below shows no official figure was issued. When TCAG followed this up in writing a response was issued by the Deputy Director at the DfT stating the estimated cost of Option A14 was £6.6bn. Comparing that to the estimated cost of C3 at the time, £5.7bn, and taking into account how much superior Option A14 was on improving air quality, safety, environmental impact etc we do not understand why HE neglected to share the cost.

LTC OPTION A14

Executive Summary

Thames Crossing Action Group

ASSESSMENT MERITS

Context and Objectives

This report sets out our assessment of feasibility for the construction of a new crossing within the Lower Thames Region, reviewing capacity at each of the three locations; 'Option A Route 14, Option C Route 3 and Option C Route 4.

	Option C3	Option C4	Option A14
Cost	£4.1 - £5.7Bn (Southern Links)	£4.4 - £6.2Bn (Western Links)	No Official Figure issued
Construction Period	Open 2025-2027	Open 2025-2027	Open 2025-2027
Road Length	13.3 Miles	15.9 Miles	~7.5Miles
Installed Capacity	70% increase	70% increase	Matches M25
A282 Traffic Reduction	14%	14%	40%
Blighted Homes	26 Residential, 22 Traveller Plots 3 Agric (HE Info)	26 Residential, 9 Commercial & 3 Agric (HE Info)	Minimal
Green Belt use (ha)*	350 to 452ha	350 to 452ha	Minimal
Overall Impact on Landscape	Largest Adverse Impact	Largest Adverse Impact	Least Adverse Impact
Number of SSSI Areas	Scheduled Monument	Park & Garden + Conservation Area	None
Effected Floodplain	Tilbury & Shornmede Marsh	Tilbury & Shornmede Marsh	None
Neg. Impact No. AQM sites	1 (Tilbury)	1 (Tilbury)	None
Detour Distance Back to M25	~10Miles	~10Miles	None
2041 Expected Conditions on the A282 (exiting crossing)	90% of capacity – Often Queuing	90% of capacity – Often Queuing	75% or less very few queues
Greenhouse Gas Impact (60yr Period)	Increase 1,300,000t	Increase 1,300,000t	Reduction of 693,000t
No. of Accidents (60yr Period)	Increase 60,000-62,000	Increase 60,000-62,000	Increase 26,000

*ha = Hectare = 100m2 or ~ 2.47 Acres

2018 LTC Statutory Consultation

Consultation Events

HE listed the Upminster Information Point as being South of the river, and Gravesend Information Point as being North of the river. It was only when we pointed this out that they even realised the errors, which gave us no confidence whatsoever.

Awareness events were not listed on consultation event promo or the official website until we questioned seeing them on social media. This is another example that HE were not adequately promoting events to give people a fair chance to attend.

East Tilbury which would be greatly impacted by LTC didn't even get a Statement of Community Consultation (SoCC) event, only got a poorly publicised mobile event. These mobile events were on a van with limited staff, materials, and information. We do not consider this to be adequate or acceptable. We also note that HE considered it appropriate to hold events in areas like Dover and Suffolk, because of the business support they would gain there, so biased in favour of HE and not genuine consultation including impacted residents.

The nearest full info event for residents in East Tilbury was in Linford. However, that event was also inadequate as many people had to queue for some time outside due to large numbers of attendees. Some simply weren't able to wait in the queue long enough to even enter the event, let alone speak to a member of the LTC team.

There were info events at Orsett, South Ockendon, and West Horndon that people also struggled to get to, and couldn't get to, due to serious road incidents in the area. Despite HE knowing the scale of the impact this had on people attending, they made no attempt to offer additional events.

At a mobile event that was held in Corringham the HE van was parked in a one way road which resulted in members of the public having to walk in a busy road to gain access to the roadside entrance to the van/event. Another inadequacy and serious health and safety issue.

Staff at all info events have often not appeared to have the knowledge to answer questions from the public.

Some HE staff were removed from events after we had to put complaints in about their inept handling of dealing with members of the public, giving misleading info, and also one with a particularly confrontational and aggressive attitude towards some of us, which was totally

unwarranted (as proven by the fact we were told that member of the team would not be attending any more events as a result of our complaint).

It should also be noted that when HE staff were unable to answer questions at events, they would tell residents they would get back to them. However, it was extremely rare that they ever had pen and paper to note down the question and contact details to respond.

Consultation Materials

Length, complexity, and volume of consultation - Due to the sheer volume and complexity of consultation materials the length of the consultation, 10 weeks, was not adequate. The timing of the consultation also fell at a time of year, in the run up to Christmas, that is a very busy time for most and we feel should be taken into consideration as another barrier for people to adequately take part. This was very intimidating and confusing to everyone, definitely not clear and informative. Legends/keys/descriptions were often greatly lacking in materials, making it very difficult for people to understand.

Fly through 'fairy tale' video[8] - this video was a very misleading representation of the proposed route that was inaccurate, misleading, and confusing.

Around 6mins 12sec when they show the A13 junctions they chose yet again not to represent the Orsett Windmill a landmark that would help most identify and get their bearings, even though we have previously mentioned this being missed out in previous presentations.

At 8mins 45sec they show the area between the M25 and the LTC motorways as a lovely area of trees, failing to show the real implications of the route and show the fact that they are stranding families locked in this space between the two motorways, with at least one of the families homes being literally within the motorway embankment. This adds insult to injury for those families, and also misleads people who may not realise the real implications and impacts of the route. Some, if they had seen families homes stranded in that section, may have changed their opinion of LTC, as trees look great, families homes stranded does not however portray the mess that HE have made of those particular homes, very misleading!

[8] [redacted]

The video also fails to show changes like the removal of the Rectory Rd bridge in Orsett, or the replacement road through the middle of the Orsett Showground. This does not show the design of the Lower Thames Crossing at the time of statutory consultation as suggested at the start of the video. The only reason for the removal of this bridge and destruction of the much loved Orsett Showground is due to the LTC, so surely it should be shown as part of the design, not hidden away so many won't even know what will happen if this option goes ahead.

Map Books – the way the maps were presented was extremely confusing, with the North orientation arrow pointing in a different direction practically every map page to page. This made it almost impossible for most people to get their bearings. The way the pages were cropped also made is very difficult for people to identify and get a clear overall image of the true impact to their area.

Private funding options (PFI and PF2) were abolished by the Chancellor in the Autumn Budget, in October (a couple of weeks after consultation began) meaning that consultation materials were then incorrect and misleading – page 122 of Your Guide to Consultation9. Cost is obviously a huge part of the project and the fact it would now be funded entirely by public money (not private) also means

9

that they will have to pay VAT on it, meaning a huge increase in cost. HE did nothing to update the info, which could have influenced people's response to consultation.

The cost of the project was only mentioned once in the consultation guide and was hidden away on page 122. Since the cost of the project would be relevant to whether the project offers value for money when considering ones support of LTC, we do not consider enough prominence was given to this, especially since the price had risen considerably from £4.3-£5.9bn in the 2016 consultation to £5.3-£6.8bn in 2018.

This was highlighted even more to us when we were having a conversation with the Cabinet Member for Economic Development for Essex County Council who was not aware that the cost has risen in the 2018 consultation.

In the Preliminary environmental information summary[10], page 11 states under Existing conditions "There are areas that currently do not exceed UK Air Quality Strategy thresholds" yet further down that section on the same page it is stated " This baseline information indicated that air quality is currently exceeding UK and EU limits across the study area". This information is confusing, misleading, and does not provide facts that demonstrate properly the fact that impacted areas already have very poor air quality.

In the consultation guide on pages 60 and 62 the A13 is shown according to the legend for the images as a motorway, which of course it is not. Followed by definite inconsistencies on pages 64,65, and 66 where the A1089 north connection to the LTC is not shown on some of the maps, when clearly other routes are shown whether they are highlighted as what is being described or not. Again confusing, misleading, and not providing the facts clearly.

In light of our previous 2016 evidence when HE firstly stated that Location A was not included in the 2016 consultation, and then changed their mind when the Minister said it was.

'The Case For the Project'[11] in the 2018 consultation materials - Point 5.1.5 again states that only Option C variants were consulted upon in 2016. Clearly HE still can't decide whether they consulted upon Location A in 2016 or not!

10 [redacted]

11 [redacted]

5.1.5 We held a non-statutory public consultation in 2016 which proposed a crossing at location C and presented three route options. These were identified as routes 2, 3 and 4. Each option included two different routes south of the Thames: the Western Southern Link and the Eastern Southern Link (see Figure 5.2).

Figure 5.2 Shortlisted routes considered in the 2016 study

Misleading Info

HE kept stating the LTC was 3 lanes all the way from the A2 to M25 when in fact a section around the A13 dropped to 2 lanes, creating a bottleneck. Even LTC Project Director (at this time) Tim Jones was not aware of this and kept using this incorrect statement in public, at presentations and to the media. We do not consider this to be clear or informative. In fact we consider it to be very misleading, and would have led many to believe the LTC to be better than it truly is, as many would question a built in bottleneck if they were aware of it, but this fact was hidden away. It also gives us

no confidence that the Project Director was not even aware of this major fact, a person who is supposed to be in charge of the whole project.

HE have been consistently using the wording that LTC will provide 90% extra road capacity which is misleading to the public. The realities of this figure are a lot more complicated than it makes it sound. 90% extra capacity would make you believe that there would be 90% more when considering lanes crossing the river. However, there are currently 4 lanes in each direction at the Dartford Crossing, 8 in total. LTC tunnels would have 3 lanes in each direction, 6 in total. This would mean that lane wise the LTC only has 75% extra lane capacity compared to the Dartford Crossing.

HE eventually explained to us in 2020 that "This is calculated based on the capacity of each lane at the Dartford Crossing and at the LTC. The capacity of the northbound crossing at Dartford is impacted by the Traffic Management Unit (which closes all lanes to allow escorts to take place, and to enable high sided vehicles in the wrong lane to be removed etc) and as such a lower effective capacity is applied. As there is to be no TMU of the same nature at LTC, the capacity per lane is higher than at Dartford, which results in the 90% increase quoted, as opposed to 75%, which is the increase in the number of lanes".

This is a very complex way of working things out that is not what the majority of the public will expect or understand the statement about providing 90% extra road capacity to mean. This statement was used in a very prominent way, which we feel has been used to try and influence people who will not fully understand what it means and will assume it is to do with the amount of lanes.

HE's traffic modelling doesn't reflect real life traffic that we experience on a daily basis, especially due to the current crossing. They have told us they take an average month, March in this case (a month that in previous years has been the worst month for incidents at the current crossing), they then record the traffic data.

However, if there is an incident that means that traffic is not what they consider to be 'normal' they remove that data from the traffic modelling. What they consider to be 'normal' with regards to traffic and incidents at the current crossing is certainly not what we consider to be normal, and we live with it on a daily basis.

The very fact they are removing the data that reflects the very problem that they were originally asked to fix, ie the problems at the Dartford Crossing, is questionable to say the least.

Fixing the problems at the Dartford Crossing – HE stated that LTC would take 22% of traffic away from the Dartford Crossing. However, this is again very misleading as when you research deeper into HE's own figures it clearly shows that the Dartford Crossing would still be over capacity. HE have failed to communicate this fact to the public clearly, instead choosing to give the impression that the LTC would solve the problems at the Dartford Crossing. We feel this has mislead many into supporting the LTC, who would otherwise oppose it if they realised it will not solve the problems that a new crossing was first tasked to fix.

- The Dartford Crossing has a design capacity of 135,000 vehicles per day.[12]
- It is currently running at between 155,000 to 180,000 vehicles per day [13] [14]
- Predicted traffic growth between 2016 and 2026 is expected to be between 17-23% [13] [14] Bear in mind that currently the proposed Lower Thames Crossing is not predicted to open until late 2027/28
- Highways England predict that there will be a 22% reduction in traffic using the Dartford Crossing if the proposed Lower Thames Crossing goes ahead.[15]
- Therefore if you take each figure that the current crossing is running at now, add the 17%, 23%, or an average of 20%, then take the 22% reduction off this is what you get:

  155,000+17%=181,350 / 181,350-22%= **141,453** vehicles per day using the Dartford Crossing
  180,000+17%=210,600 / 210,600-22%= **164,268** vehicles per day using the Dartford Crossing

  155,000+23%=190,650 / 190,650-22%= **148,707** vehicles per day using the Dartford Crossing
  180,000+23%=221,400 / 221,400-22%= **172,692** vehicles per day using the Dartford Crossing

  155,000+20%=186,000 / 186,000-22%= **145,080** vehicles per day using the Dartford Crossing
  180,000+20%=216,000 / 216,000-22%= **168,480** vehicles per day using the Dartford Crossing

[12] Page 20 -

[13] Point 1.2.5 -

[14] Page 19 – *Points* 6.2.32 and 6.2.37

[15] Page 22 -

Clearly the Dartford Crossing would still be over it's design capacity of 135,000 vehicles per day.

LTC Project Director (at the time) Tim Jones has also stated that LTC will not solve all the problems north and south of the river due to the current crossing, we have an audio recording[16] of him stating that fact from an LTC Task Force meeting at Thurrock Council, and he has also stated it again numerously publicly.

Migration between two crossings – HE have not made it clear that they have not taken into account or planned for how traffic will migrate between the two crossings when there are incidents, and made apparent the lack of adequate connections to do so.

Again, this is misleading and inadequate clear and informative material to hide this fact that most would assume will be taken into account as a matter of course, especially due to the unique aspect of the scheme being to fix problems crossing the river.

Communication issues

Delays in response by HE to questions submitted via email during consultation period.

Letters sent in error to residents telling them they are within the development boundary when they weren't, causing much concern and stress.

Thurrock Council raised concerns over the lack of meaningful engagement by Highways England.

The amount of misleading info has been a concern. Right up to the present day, where we are still witnessing LTC/HE on Twitter retweeting articles that include old out dated maps, that still show the Tilbury link road which was removed when the details of consultation were issued. To us this means that HE/LTC have not provided clear and accurate info if media and others are using out dated maps etc. The fact they are then promoting this misinformation by retweeting it just about sums up their inadequacies and the fact they are happy to be misleading everyone over LTC.

[16] [redacted]

Biased info

Press releases such as www.gov.uk/government/news/lower-thames-crossing-opens-its-doors-at-first-of-sixty-public-events for the consultation have been heavily biased in favour of the crossing, to the extent that no opposition was noted at all, only support. There is plenty of opposition to the LTC yet they included none of it. We have emails, letters and conversations from various people, businesses, local authorities, councillors, MPs who are all opposed, you don't have to go far to find them. Yet again HE chose not to represent this in their consultation and promotional activities.

Online promotion of the LTC consultation has again been biased to show only support of the project, not giving fair representation. Where were the voxpops for residents? None, only for businesses that feel they stand to benefit from LTC, again biased representation. And these businesses are fed a different story to that portrayed to the residents that will lose their home or have their lives turned upside down. These businesses have only ever been offered C3, obviously with a need for another crossing they are quick to support it but we doubt that would be the case if they were fully informed, or given other alternative routes to choose from.

At HE info events there is no indication of any negative points in any of the display material, it is all positively biased. With a project of this size it cannot be 100% positive, yet HE have chosen not to display any kind of negative impacts, again leading to biased view and misrepresentation of the LTC. The point of the consultation being to present the facts in a clear, easy to understand, unbiased manner so that people can review the info and give their own educated opinions.

We again note that HE informed DartCharge users about the consultation, which we feel yet again creates biased in HE's favour. Many DartCharge users will just be aware they pay to get stuck in traffic at the Dartford Crossing and will think any other new crossing has to be better, without any real consideration or research.

Consultation Response Form

We consider question 1 to be misleading and biased in an attempt to get the support they need and want for the project. It is worded in a way that confuses people into showing support for LTC specifically, rather than just a new crossing in general.

1. The need for the Lower Thames Crossing

The case for the Lower Thames Crossing, including the reasons why we consider it is needed, is set out in Section 4 of **Your guide to consultation** and in the **Case for the Project**.

Q1a. Do you agree or disagree that the Lower Thames Crossing is needed?

☐ Strongly agree	☐ Agree	☐ Neutral	☐ Disagree	☐ Strongly disagree	☐ Don't know

2020 LTC Supplementary Consultation

Timing of the consultation

The consultation was rushed and pushed through in an attempt to fit it in between the General Election and what should have been Purdah for local elections (which were cancelled due to COVID-19)

The fact HE announced there would be a further consultation later in 2020 before this consultation had even ended is evidence that they rushed it and already knew they would need further consultation.

Rather than prepare a consultation efficiently and wait until they were truly ready they ended up creating consultation fatigue by forcing two consultations, within 15 weeks of each other, on people when one consultation could have been held to cover what they ran in two separate consultations.

Notification of consultation

There was not adequate notification of the consultation, especially to residents in impacted areas. When quizzed about missing leaflets that were meant to inform residents of the consultation HE passed it off as it is down to Royal Mail once they send them. No genuine concern of our reports that people were not receiving the leaflets and many did not know about the consultation, or if they found out about it it wasn't from HE and was later on, limiting their opportunity to respond.

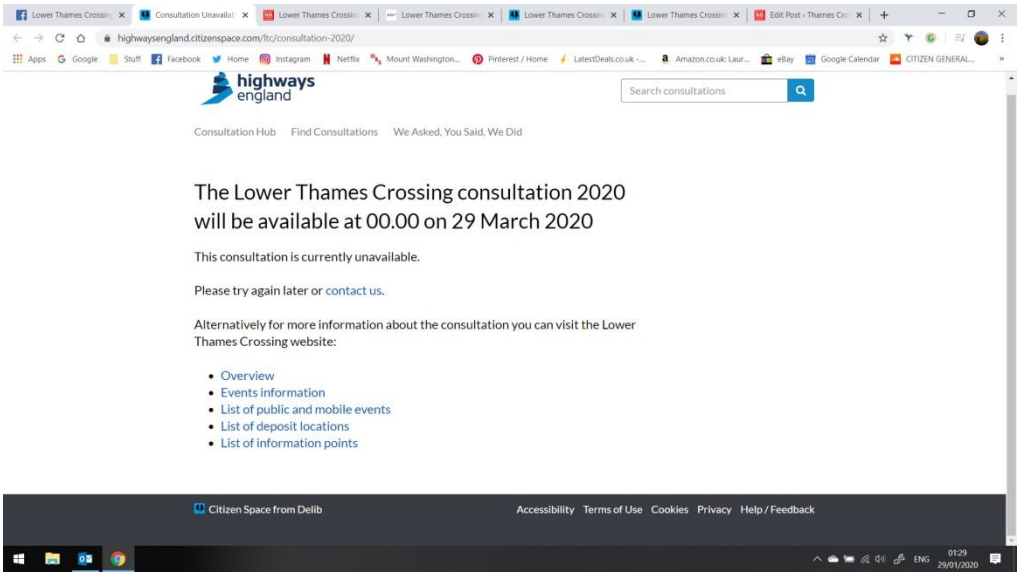
HE said they had also used local newspapers and radio to promote the consultation. Local papers are no longer delivered in our area, and nobody has ever recalled hearing promo on the radio.

We do however note that HE informed DartCharge users about the consultation, which we feel yet again creates bias in HE's favour. Many DartCharge users will just be aware they pay to get stuck in traffic at the Dartford Crossing and will think any other new crossing has to be better, without any real consideration or research.

We also wish to express our concerns over the fact that it seems HE failed to supply press and media with an up to date copy of the overall route map. This has resulted in many, including national press using old out of date maps from 2018. We can only assume they obtained the maps from the out of date HE/LTC website.

Consultation website issues

There were major issues with HE's consultation website with it having serious accessibility issues within an hour or two of the consultation launching. Including at one point a message saying that the consultation was not available and didn't start until 29th of March, even though it will only actually run until 25th March. People turned to social media to question what was going on and how to access the info.

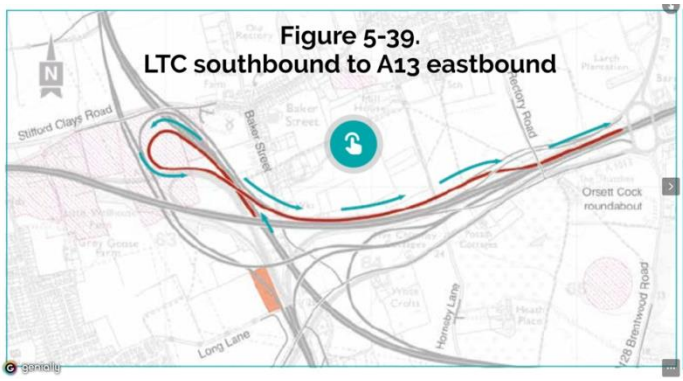


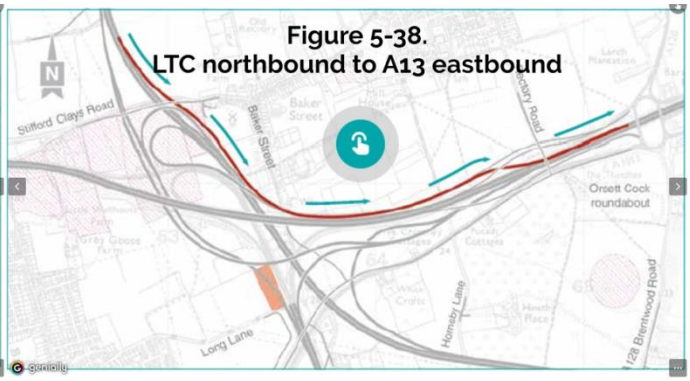
Firstly, the fact the website needs to be taken down whilst updates are done is ridiculous, and proves HE/LTC are not even capable of making the right choice with regard to how the website is set up. There is absolutely no need to have to take a website down to be able to update. It a choice that HE/LTC made, to have a website that can't be updated without taking the site down.

Secondly, the fact that it was deemed necessary to have to update the user experience within an hour of launch is unbelievable. Clearly another example of HE/LTC not being adequately prepared, most likely because the consultation was being rushed to fit in between the General Election, Government being re-formed, and before the expected purdah for local elections (which of course have since been postponed).

Thirdly, why was the website not ready and checked before launch?

Much of the info was confusing and contradictory. E.g. HE are struggling to know which way is North and which way is South again! Image clearly show which direction North is yet the arrow showing the directions of traffic contradicts this.





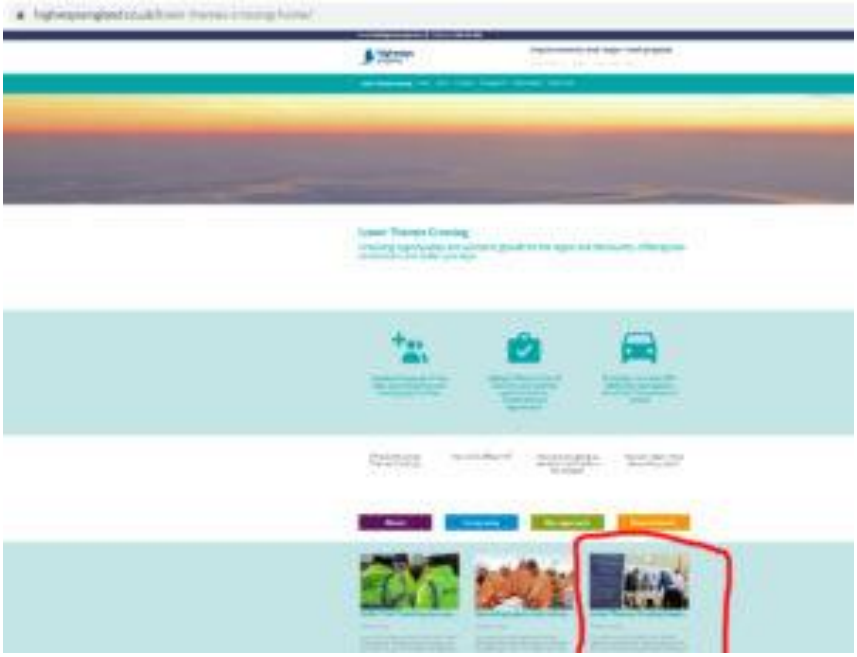
LTC official website out of date

Below we detail and evidence the inadequacies of the official HE LTC project website are available. This information clearly shows that the official LTC project website contained out of date information, which was extremely misleading during the Supplementary Consultation period.

Inadequacies of the official LTC project website

Below are the details we listed page by page to show the inadequacies of the official Highways England Lower Thames Crossing website, highlighting the inaccurate and misleading info.

Home Page



On the home page the only suggestion that there is currently a Supplementary Consultation happening is a small update at the very bottom of the page, dated Jan 23rd. This is an extremely

discreet mention considering this is the only notification on the home page of the official LTC website that is currently running.

We have screen captured the Home page and circled the reference to the Supplementary Consultation in red. Bear in mind this image shows the page zoomed right out to allow us to screen capture. If you visit the site/page yourself you will likely need to scroll down before even seeing the area circled in red.

The image used is a stock image from the Statutory Consultation which does not give the impression of drawing attention to something new and current. The title of the section is abbreviated so that you can't even see the wording of Supplementary Consultation in the title. It's almost like HE are trying to hide the fact there is a consultation happening!

About Page

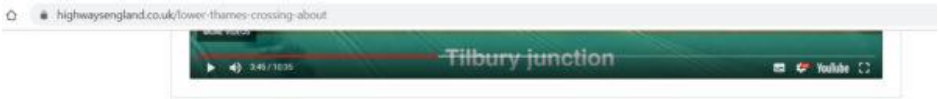
We have highlighted some of the errors on the About page in red in the image below.
HE are showing the route at approximately 14.5 miles, yet in the latest update they are now referring to it as being approximately 14.3 miles.

We have always questioned "3 lanes in both directions" since they started announcing it as that during the 2018 Statutory Consultation, as there was a 2 lane section around the A13 junctions. However, now they have actually announced in the latest update that the LTC southbound between the M25 and A13 will be 2 lanes, so again this is not a true and accurate representation.

"two 2.5 mile (4km) tunnels" is also inaccurate as the latest changes state that the tunnels will now be two 2.6 mile (4.3km) tunnels.

We also question how they get the figure of 90% extra road capacity, and have emailed to ask for an explanation.
There are currently 4 lanes in each direction at the Dartford Crossing. 4+90% = 7.6 lanes.
The proposed tunnel section of LTC is 3 lanes in each direction. 4+75% = 7 lanes. Last time we checked 4+3 was 7 and not 7.6!!
Reference to the 2016 consultation is also outdated and could have commented on the 2018 Statutory Consultation.
The latest info can all be confirmed on pages 6 and 7 of the Supplementary Consultation Guide.

The video included on this page is definitely out of date and not a true representation of the current proposed route. It is the fly through video that HE produced for the 2018 Statutory Consultation.
One of the most obvious inadequacies of the video, amongst many, is it still clearly shows things like the Service Station and Tilbury junction which have now been removed.

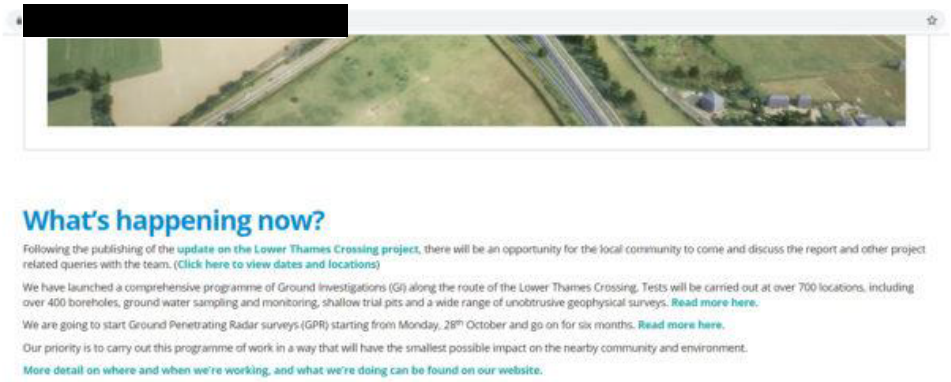


When captured on Feb 17th the time line shown at the bottom of the page, stated 2018 Statutory Consultation and then jumped straight to 2020 as Submission of DCO Application. No mention of the Supplementary Consultation.
Many people are concerned and confused as to what is happening, and where we are within the time line of what has to happen.

When checked again on 6th March they have now added the Supplementary Consultation to the time line. However, the outdated and now misleading fly through video can still clearly be seen just above it still! Why are they updating certain things but not others?!

In My Area Page

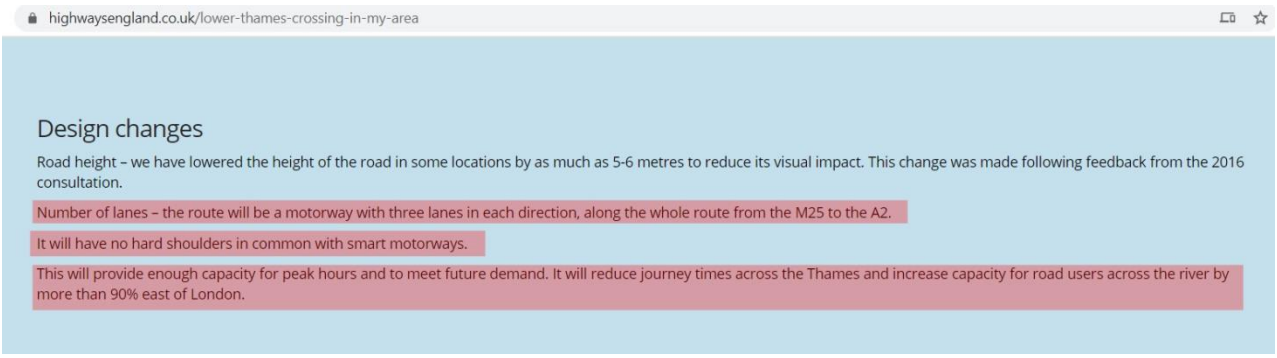
Again another reference and chance to watch the now out of date fly through video of the proposed route which was released in 2018.



A section titled ‘What’s happening now?‘ which makes no mention of the Supplementary Consultation at all. In fact the info they share about the Summer 2019 Project Update, Ground Investigations and Ground Penetrating Radar Surveys were announced in July 2019. It even includes a link to the Summer Engagement events that happened in 2019.
But no mention of the current Supplementary Consultation or public info events.

Under the same heading of ‘What’s happening now?‘ a clearly out of date map, as it still shows the Tilbury junction, which has been removed as part of the Supplementary Consultation!

More questionable statements highlighted in red in the image below.

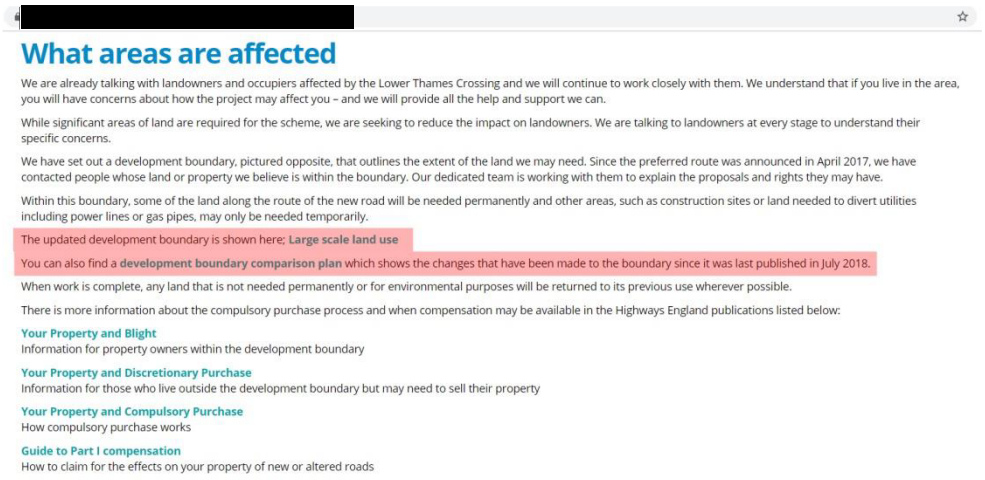


Again it is not 3 lanes in both directions, there is a 2 lane section southbound between M25 and A13. It is also stated that it will be a motorway. HE have categorically told us that the road has yet to be categorised, suggesting when asked at the February LTC Task Force Meeting that it would likely be categorised an all purpose trunk road.
The fact they list it as having no hard shoulders in common with smart motorways, also is a cause for great concern considering how dangerous Smart Motorways are. Not forgetting that we specifically asked David Manning, Development Director, HE at Feb LTC Task Force if it would be a smart motorway.

Listen to a section of audio recording of that meeting which covers this on the original article on our website about these inadequacies - [redacted]

If you wish to hear the answer to the second part of this question, or indeed the audio of the whole meeting it can be found here.

Again another reference to the **90% extra road capacity** that we are waiting for HE to explain!



What areas are affected

We are already talking with landowners and occupiers affected by the Lower Thames Crossing and we will continue to work closely with them. We understand that if you live in the area, you will have concerns about how the project may affect you – and we will provide all the help and support we can.

While significant areas of land are required for the scheme, we are seeking to reduce the impact on landowners. We are talking to landowners at every stage to understand their specific concerns.

We have set out a development boundary, pictured opposite, that outlines the extent of the land we may need. Since the preferred route was announced in April 2017, we have contacted people whose land or property we believe is within the boundary. Our dedicated team is working with them to explain the proposals and rights they may have.

Within this boundary, some of the land along the route of the new road will be needed permanently and other areas, such as construction sites or land needed to divert utilities including power lines or gas pipes, may only be needed temporarily.

The updated development boundary is shown here; **Large scale land use**

You can also find a **development boundary comparison plan** which shows the changes that have been made to the boundary since it was last published in July 2018.

When work is complete, any land that is not needed permanently or for environmental purposes will be returned to its previous use wherever possible.

There is more information about the compulsory purchase process and when compensation may be available in the Highways England publications listed below:

Your Property and Blight
Information for property owners within the development boundary

Your Property and Discretionary Purchase
Information for those who live outside the development boundary but may need to sell their property

Your Property and Compulsory Purchase
How compulsory purchase works

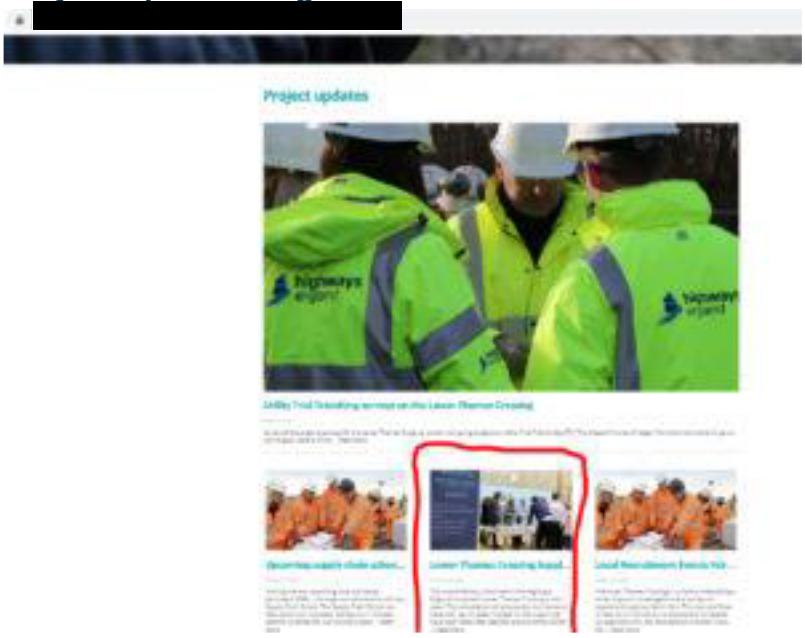
Guide to Part I compensation
How to claim for the effects on your property of new or altered roads

Finally on that page of their website a section called '*What areas are affected*'.

The map they refer to as the updated development boundary (this map) is clearly out of date, it is from Statutory Consultation in 2018.

The development boundary comparison plan is also out of date (2018).

Project Updates Page



Again the **Supplementary Consultation is being hidden away**. The current featured update relates to the Utilities Trial Trenching survey works.
Then there is an article about the Supply Chain School events.

Considering HE have NOT submitted a DCO application yet, let alone been granted one, maybe they should be giving more priority to ensuring that everyone is aware of the Supplementary Consultation!

Keep in touch Page

This page states "*You may also visit one of our information points in local communities to pick up Lower Thames Crossing print material.*"
The link provided takes you to a list of locations that do not all have the most up to date info about the Supplementary Consultation. We know this as we, along with many of our members have been along only to find there are no Supplementary Guides and response forms etc at some of these locations!

On this page they also state "*We want to make sure that information about the Lower Thames Crossing project is accessible to as many people as possible.*
That is why we are sharing an update on the progress of the scheme with local communities by post this week. You can view this information on our November project update page."
Seriously, the latest info they provide is November, and no comment about keeping in touch with the latest updates by getting involved in the Supplementary Consultation?!!

Conclusion

Having out of date maps, videos and information at any time is bad enough, but during a consultation is totally unacceptable. HE/LTC link to this official website for the LTC project from their social media accounts. It is also provided as a reference point within the consultation guide. Not to mention that if anyone searches online for LTC they would find this project website in the top search results. The response we got from Chris Taylor, Director, Complex Infrastructure Programme at Highways England states that the thorough review which we provided of the project website has been passed onto the digital team, and will be incorporated into updates to the website that will take place following the conclusion of the consultation in April.

Erroneous letters sent by HE/LTC Land & Property team

There were yet more inadequacies with HE sending letters telling residents their property is now in the development boundary, when it is not. HE only accepted and admitted error and sent apology letters after it was brought to their attention. It is not acceptable for such stress inducing mistakes to continuously happen.

Consultation materials

TCAG requested copies of all available Supplementary Consultation materials including maps and any available documents be sent to us as soon as possible in line with consultation launching. This request was emailed a few days prior to the launch on Jan 29th . We did not receive the requested copies. We actually ended up getting copies of the 'Environmental Impacts Update', 'Traffic Modelling Update', and 'Utilities Update' ourselves at the first info event on Feb 21st.

Also, there were delays in getting TCAG paper copies to take with us to community forums we were speaking at early on in the consultation, ie before COVID-19. HE did not show willing to ensuring we had the copies needed, and near the start of consultation we were told there was an issue with stock availability. Another example of how they were not prepared for consultation and that it was rushed.

Materials were yet again not clear and informative as is required. Technical and industry terminology was often used, which was confusing and often alienated the public from understanding what was being said.

Info was also yet again misleading and biased in favour of HE's wants. E.g. they promoted key points that said the Rest and Service Area and Tilbury Junction/Link Rd had been removed. However, when you went deeper into the documents it became clear that discussions are still being had about the rest and service area as a separate stand-alone project. The same with the Tilbury Junction/Link Rd, which is now a RIS3 pipeline project.

We feel this was done to avoid public conflict to the LTC scheme, and in an attempt to make the LTC benefit cost ratio look better than it truly is. Inadequately representing the true cost of the project. It should also be noted that this inadequate representation of cost should also take into account things like the Blue Bell Hill Improvements which are currently being consulted upon as a direct result of LTC impacts, and are estimated to cost £142m. Biased presentation of the scheme yet again.

We were also told in 2018 consultation that the rest and service area 'had' to be included at the time because of industry health and safety guidelines, the fact they were removed clearly means we were being given bad info in 2018 as they did not 'have' to be included. We question again if this was to gain support from the likes of Port of Tilbury, Road Haulage Association, Freight Transport Association in 2018. HE again manipulating consultations to get the results they wanted.

Map Books errors – It became apparent that there was an error in Map Book 3 during Supplementary Consultation, which was confirmed in the Design Consultation when HE admitted "*This map book also contains updated existing ground levels from chainage 5+500 to chainage 20+250 which were shown*

incorrectly in the supplementary consultation map book 3. The existing ground level figures were shown shifted north by 250 metres."

There was also a missing page in Map Book 2 that should have showed that the development boundary now goes all the way up to J28 on the M25. When HE are promoting LTC as a new river crossing from Gravesend to East Tilbury it doesn't help when they miss showing the realities of the impact all the way up to J28 on the M25 in the maps. This fact is also not shown in the maps throughout the consultation guide.

Map legends were confusing, and not easily understandable by the public. Things like 'Land not included within the Order Limits' means nothing to joe public and there was no explanation or glossary. We had to ask HE to explain, this is another example of inadequacies and materials not being clear and informative.

Cranham Solar Farm info was inadequate and confusing. The consultation guide never showed that Cranham solar farm was to be demolished. The guide actually listed it as a proposed solar farm, even though it has been operational since 2016! The Land Use map was very confusing in Supp Con as it shows the Solar Farm as colour coded as 'building requiring demolition', but also being shaded as 'environmental mitigation'. How demolishing a solar farm can be deemed environmental mitigation is baffling.

M25 junction 29 - HE have never made it clear that the current M25 northbound junction 29 access will be removed as part of the LTC plans. They also split the images of the two sections of the junction to try and hide this. Pages 70/71 and 78/79 in the consultation guide. This means it is not clear or informative to view the junction as a whole. Many have only realised what is planned after investigative works have started since consultation period ended, due to seeing works in locations and having to find out why.

Public rights of Way maps and details, were confusing and misleading. In some cases stating they were proposing footpaths when in actual fact there is an existing footpath there now. They state things like they are connecting South and North Ockendon which is misleading because there is not actually a footpath being proposed to connect the two areas as the footpath only goes east or west once across the North Rd green bridge over the LTC, not in a northerly direction to North Ockendon.

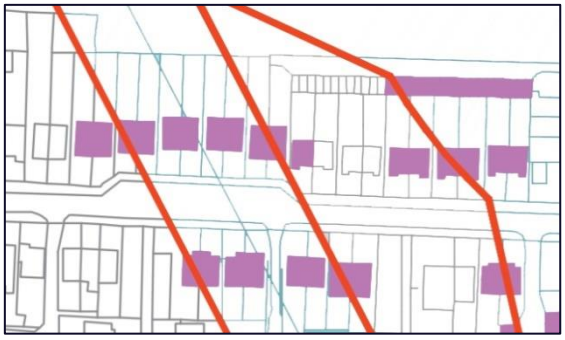
Lack of adequate wildlife/habitat surveys/desk studies Our understanding is that HE/LTC have been using Essex Wildlife Trust data up to this point, which we know to be very limited. Essex Field Club's comprehensive records and knowledge would be far more adequate. How can we be consulted adequately when we are not fully aware of the true environmental impacts to know if the proposed mitigation is adequate?

Pages 69 and 71 in the Guide to consultation[17] state contradictory information about the lengths of the viaducts in the Mardyke valley.
Page 69 – "Overall we have increased the total length of the viaducts in the area by approx. 50m"
Page 71 – "The viaduct across the Mardyke River and Golden Bridge Sewer River have been shortened from approx. 450m to 350m"
How is anyone expected to make sense of these statements that are referred to being increased on one page and shortened on the other?

Flood mitigation HE were asking us to comment on environmental aspects such as flood mitigation, but did not provide unbiased fact based evidence and information so that we can come to our own conclusions. There has been no data provided about flood risk to assist us in meaningful responses.

Poor communications We would state unequivocally that in our experience and the experiences of members of our group that communications from HE, and particularly the Land & Property Team have been absolutely diabolical and without any true care or understanding of the impacts these communications are having on people's lives and health. Late letters, erroneous letters, residents being put in and out of boundary, poorly worded letters causing stress and confusion. All reported time and time again over the years, yet still no improvement or safeguards have prevented this from keep happening continually.

Confusing maps and plans Residents have been receiving letters along with Land Use maps and close up property/land plans. As can be seen in the two images below the Land Use map is colour coded, yet the close up is not, which makes it very confusing to try and work out what is considered inside the boundary and what is not. Hardly clear or informative.



[17] [redacted]

Impacts to existing road network The Traffic Modelling Update shows increases and decreases on the existing road. However, when you view the data online and zoom it to get a closer look it is very confusing. There are sections like the Orsett Cock roundabout that look like a rainbow with all the various colours. Considering the range that the various colours cover it is impossible to understand exactly how such drastic changes would be possible in one roundabout alone. As highlighted by arrow in the image below.

Crossing Charges inc Local Residents Discount Scheme – The info is contradictory. Unless the LDRS covers all local impacted areas for both crossings it cannot simplify the choice of which crossing to use.

Complex junctions – HE do not make it apparent how difficult it would be to turn around and correct a mistake if you take the wrong junction, some leading to detours miles long, and the need to pay the crossing charge twice (once each way) for your mistake.

Emergency Areas - There was not adequate info on where the Emergency Areas would be on LTC, considering the public interest in this kind of info in light of all the media coverage of the dangers of smart motorways, HE avoided sharing this info in a clear and informative manner.

Design Capacity - HE refused to provide us with a figure for the design capacity of LTC, despite constantly using the design capacity of Dartford Crossing in their materials.

Inadequacies of WEBTAG - we are aware that Webtag which HE use for traffic modelling is considered by many, including the industry to be outdated.

Easy read guide – not at all clear or informative

Page 40 in Map Book 1 labels Stifford Clays as Little Thurrock. If anyone is looking through trying to work out the impacts LTC may have on their area and they see Little Thurrock instead of Stifford Clays they may not identify the true impacts, because of this error.

Tilbury Power Station is still shown and labelled in the HE map books. The Power Station has been demolished, so we cannot understand why the footprint of the buildings are still being shown on maps, including the Land Use maps for Property. We would also question why Tilbury 2 footprint is not being shown on the maps, and therefore we would assume not being taken into account.

HE keep displaying junctions in confusing ways - their own staff have complimented us on the colour coded keys/maps we create for junctions each consultation that makes it so much easier for people to understand. Yet even though we have suggested it, they have never made any attempt to make their own maps easier to understand, leaving most people very confused about the complex junctions.

HE removed one lane (in both directions) from the A2 to the M2 at the LTC junction. We are not aware that this was mentioned anywhere in documents, and was only picked up on by someone zooming in on Map Book 1 and comparing it to the same in the 2018 Map Book 1. Another example of HE hiding away significant changes.

When the consultation was first published, the guide erroneously referred to "a new link road connecting Valley Drive to the *A2* eastbound", when in fact it connects to the *M2* eastbound. It was not until the second half of the consultation period that this was quietly corrected to refer to the M2. By this time, the damage had been done – many consultees to the east of Gravesend are still under the false impression that the new link road will provide them with direct access to the A2.

The consultation guide detail about the AONB and Shorne Woods Country Park was biased and misleading, and did not accurately reflect the info in the Environmental Impacts Updated.

Overall there was a general lack of detail that people needed and wanted throughout the consultations, particularly in relation to how things would look visually, and more info on heights and junctions etc. The complexity of the documents meant that considerable effort was needed to even try and understand consultation materials that certainly were not clear and informative.

Consultation events

At HE info events there is no indication of any negative points in any of the display material, it is all positively biased. With a project of this size it cannot be 100% positive, yet HE have chosen not to display any kind of negative impacts, again leading to biased view and misrepresentation of the LTC. The point of the consultation being to present the facts in a clear, easy to understand, unbiased manner so that people can review the info and give their own educated opinions.

Inadequate info and mobile events, which didn't include certain areas that would be impacted and should have had opportunity of an event to attend.

We experienced and witnessed various occasions where members of the HE team did not respond correctly to members of the public. For example, but not limited to, HE staff telling members of the public they could respond to consultation by emailing info@lowerthamescrossing.co.uk which was not an official response channel. Construction team staff not being able to state proposed construction hours.

We are also aware that the phone events were no better either, we are aware some people were given incorrect information over the phone.

Consultation response form - the wording in the consultation response form is confusing and not considered user friendly by many.

Lack of meaningful engagement - There is a definite lack of meaningful engagement from HE to our Local Authorities, our MPS, us as an action group representing thousands of residents, and the resident directly. We find this totally unacceptable and extremely concerning.

COVID-19

Consultation events had touch screen pads near the entrance/exit inviting attendees to log their thoughts on the event. It was some time before HE properly provided and used adequate sanitisers to cleanse these touch screens, and the maps, books, tables, and general surroundings/handles etc at the events, including the mobile van unit.

The very people that would be most impacted by health issues due to LTC were the same ones most at risk from COVID-19, and no consideration was given that they were in fear of attending the events because of the virus, but had no adequate means to obtain info and be able to respond to the consultation. Calls for the postponement of the consultation until such time as it could be carried out safely and adequately were ignored.

HE kept promoting that Deposit Locations and Info Points were still available despite the majority of them being closed due to COVID-19. This meant that people were without access to get copies or view materials. This would have impacted those who do not have internet access in particular, limiting their ability to take part in the consultation.

Later consultation events were cancelled, meaning many missed the opportunity to attend an event.

The one week extension to the Supplementary Consultation was only advertised to those it reached online. We are not aware of any other attempts of communicating this information by any other means offline. Yet again discrimination against those who are not online.

The two phone events are also not considered to be adequate. It would be impossible for HE staff members to answer certain things over the phone adequately without visual aids, such as maps, plans, images, video. At the info events we attended it was perfectly clear that these kind of visual aids were used constantly by the HE staff to help answer people's questions. To remove that option would clearly have left big gaps in their ability to answer questions efficiently and adequately.

Land Interest Questionnaires sent during COVID-19 lockdown caused much confusion and stress to all, especially to older members of the community who had no support due to lockdown, and when everyone was dealing with lockdown stress in unprecedented times.
HE failed to take into account the very genuine and serious impact that COVID-19 had on everyone's lives, and how that affected their ability to participate in the consultation during such unprecedented times.

Further Consultation – the fact that HE announced a further round of consultation implies that they weren't suitable ready for this consultation, as clearly they were identifying the need to hold further consultation before the current consultation had ended. This in also not in keeping with keeping consultation fatigue to a minimum.

2020 LTC Design Refinement Consultation

COVID-19

In addition to the issues already raised in relation to COVID-19 in the Supp Con HE then inflicted a further round of consultation upon us during a global pandemic. With no consultation events whatsoever it had a huge impact on people's ability to gather info and knowledge during the consultation. Digital first meant that many who are not online missed out. Even those who are online could be limited to phone screens etc which makes viewing maps and some documents very difficult as you can't view the whole thing in enough detail on smaller screens. Considering the COVID-19 crisis we also consider the length of the consultation to have been inadequate.

Webinars – were not as easy and beneficial as HE were making out. You had to download software/app, instructions were vague and confusing. HE did not log any unanswered questions submitted during the webinar and then send responses later, plus they didn't give adequate opportunity for you to copy and paste any questions you had submitted that weren't answered. HE did not allow adequate time during webinar for Q&As and no opportunity to follow up for clarification of answers if you were lucky enough that your question was asked. In general the webinar was just another excuse for HE to advise you to email or phone with questions, rather than being a source of information. Lack of promo that the webinars had BSL interpreters and captioning

Telephone Call Back Service At least one HE helpdesk agent was not aware they were arranging LTC call backs. Some call backs that were booked were not made. The phone number was not a Freephone number meaning if you needed to call you to get info you had to pay for it.

Emails - Slow response time on email replies for answers to questions. Many emails not replied to until within 24 hours of consultation ending. HE often avoided answering specific questions instead preferring to offer standard copy and paste replies that did not provide the info requested.

Info points Whilst limited due to COVID-19 the ones that were open many didn't know about, due to purely online promotion of them, which was hidden away to say the least

Leaflets were only sent to properties within 2km (1.2miles) of route not acceptable, a far greater area will be impacted by the route and everyone needs to be aware of any consultation.

Lack of promotion due to everything going on with COVID-19 we do not consider that there was adequate promotion of the consultation, and most expected it to be paused due to COVID-19.

The consultation

Another rushed consultation - we feel this is yet another rushed consultation, with HE just trying to tick all the boxes and progress through the process as quickly as possible without real care or consideration.

Consultation fatigue – HE clearly didn't prepare for the earlier 2020 consultation adequately since this later consultation was announced before the Spring one had ended. This resulted in unnecessary additional consultation fatigue having two within 15 weeks.

LTC official website out of date

Despite the fact that during the Supp Con we brought to HE's attention, and expressed our great concern about the official LTC website being out of date during that consultation period, we note that yet again the official LTC website was out of date during Design Consultation.

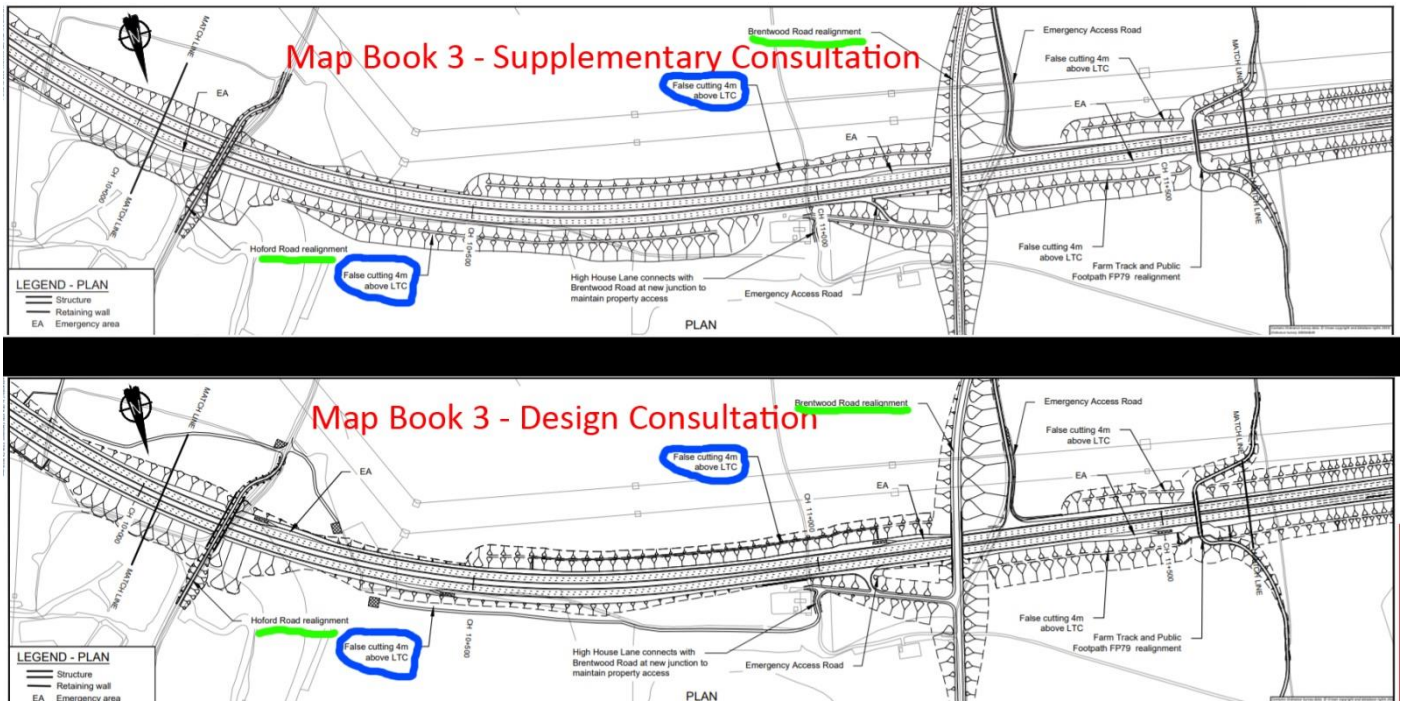
This included things such as an LTC timeline which didn't list the Design Consultation despite the fact it was live. No mention of the consultation on the 'What's happening now' page. Out of date maps on the route page. Out of date details referring to the Tilbury junction. We note that the new interactive map had been added, so clearly some maintenance had been done to add this, so why have other such important updates not been done?

Consultation materials

The consultation guide quality was greatly lacking to say the least, as it actually started falling apart in your hands very quickly without excessive use. Pages falling out certainly doesn't help when you are trying to understand the content.

There was no mention that there had been a significant increase in the estimated cost of LTC

Map book errors – whilst HE stated that the false cutting had been removed, there was no sign of it being removed in Map Book 3 (see image below)



Maps – Stifford Clays was labelled as Little Thurrock. Stanford spelt Standford. Visual evidence of this is available on the TCAG website[18]

There is no continuity in the map legends in the consultation Guide, Map Books, and the Interactive maps. This leads to confusion with differences in the keys for the same items across the various maps, and keys that are too similar for different things being used. E.g. diagonal lines in different colours get confusing when black diagonal lines over a coloured background are also used.

There was an Environmental Impacts Update booklet, but this wasn't advertised clearly, or sent out as a matter of course when people ordered paper copies of materials, since there were not events etc to go to to get copies due to COVID-19. People had to discover the booklet existed and then contact HE to request a copy be sent.

This Environmental Impacts Update also kept referencing the PEIR which was not available offline.

The paper copies of maps sent out were lacking the detail most needed and wanted, and also omitted some details of the design, but HE did not make it clear that other detailed maps were available upon request.

[18]

HE stated that they were limiting paper copies of materials to one per household, which is not adequate considering there are many multiple occupancy homes these days. Whilst we are not aware of anyone being refused copies, the fact HE put this statement in writing could have deterred people from requesting copies.

Also, no facility on the order form to request additional response forms if needed.

HE failed to provide adequate info/imagery with regard to what people can expect from some of the utilities aspects of the project. They are again using industry tech terminology such as Gas Pipeline Compounds and Electricity Switching Stations that nobody is familiar with. Footprint dimensions alone do not give adequate detail of what to expect, or the operational aspects of these facilities, eg noise, safety/risk etc.

No virtual 3d models or videos to show heights, junctions etc of LTC yet again, despite the fact we have commented on numerous occasions and requested some form of 3D modelling or an adequate new video of the proposals that would help everyone have a better understanding of exactly what is being proposed.

Whilst the Map Books in the Design Consultation highlighted the errors/corrections made since Supplementary Consultation with regard to Map Book 3, they omitted to highlight the fact that Sheet 21a of Map Book 2 was missing in Supp Con.

Map Book 2 is also still labelling and showing the foot print of Tilbury Power Station which closed and was demolished between 2016-19. Tilbury 2 is being constructed yet it is not shown at all in any of the maps. The map is labelled Tilbury Power Station and shows the footprint of the power station as though it is being acquired. Using out of date map info is not acceptable, clear or informative.

North changing position on every page in Map Books is still an inadequacy that makes it very difficult and confusing when trying to view the route.

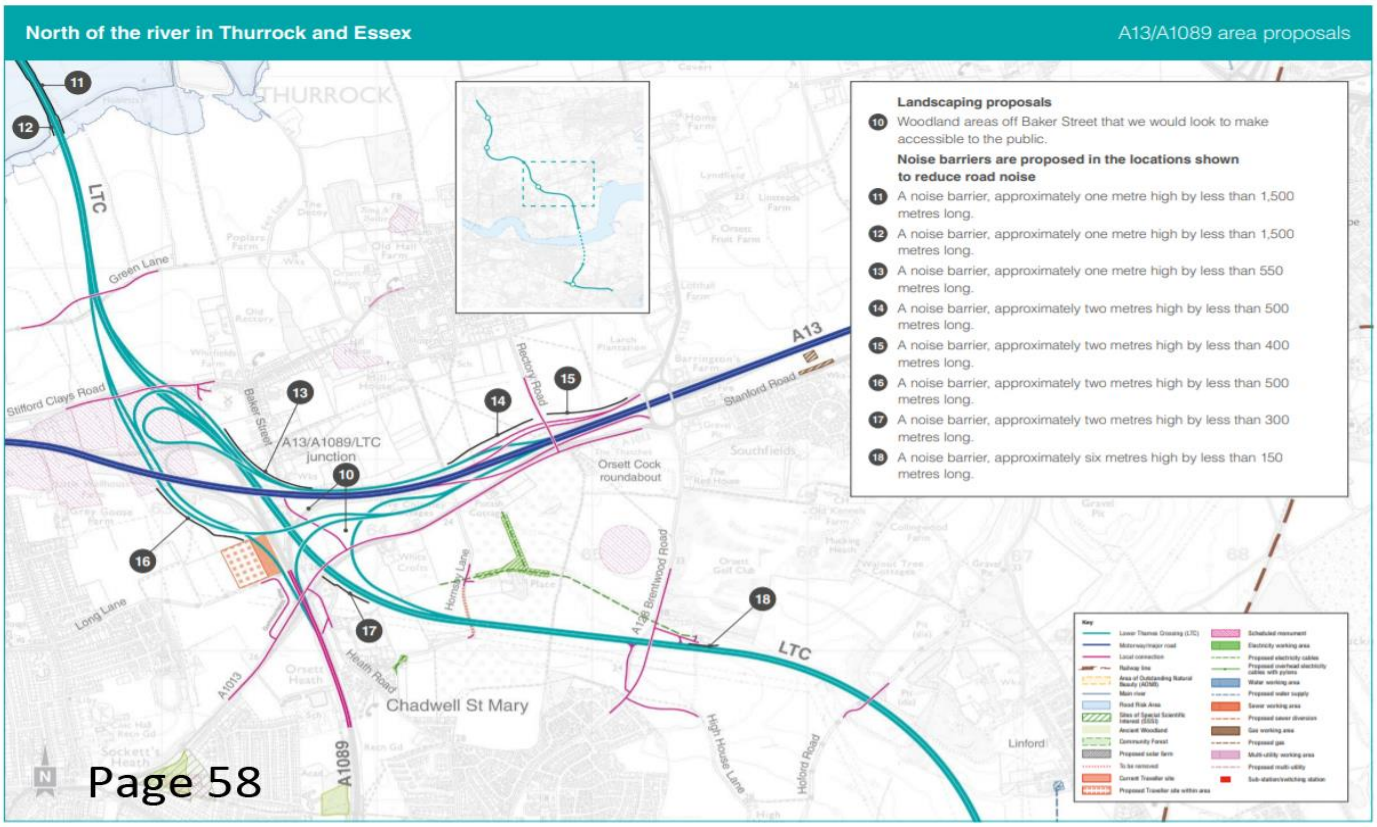
There were issues with the Interactive maps not working/loading . Sometimes the maps would not load at all, sometimes they had error messages, sometimes they loaded but not the overlay that showed the detail/legend.

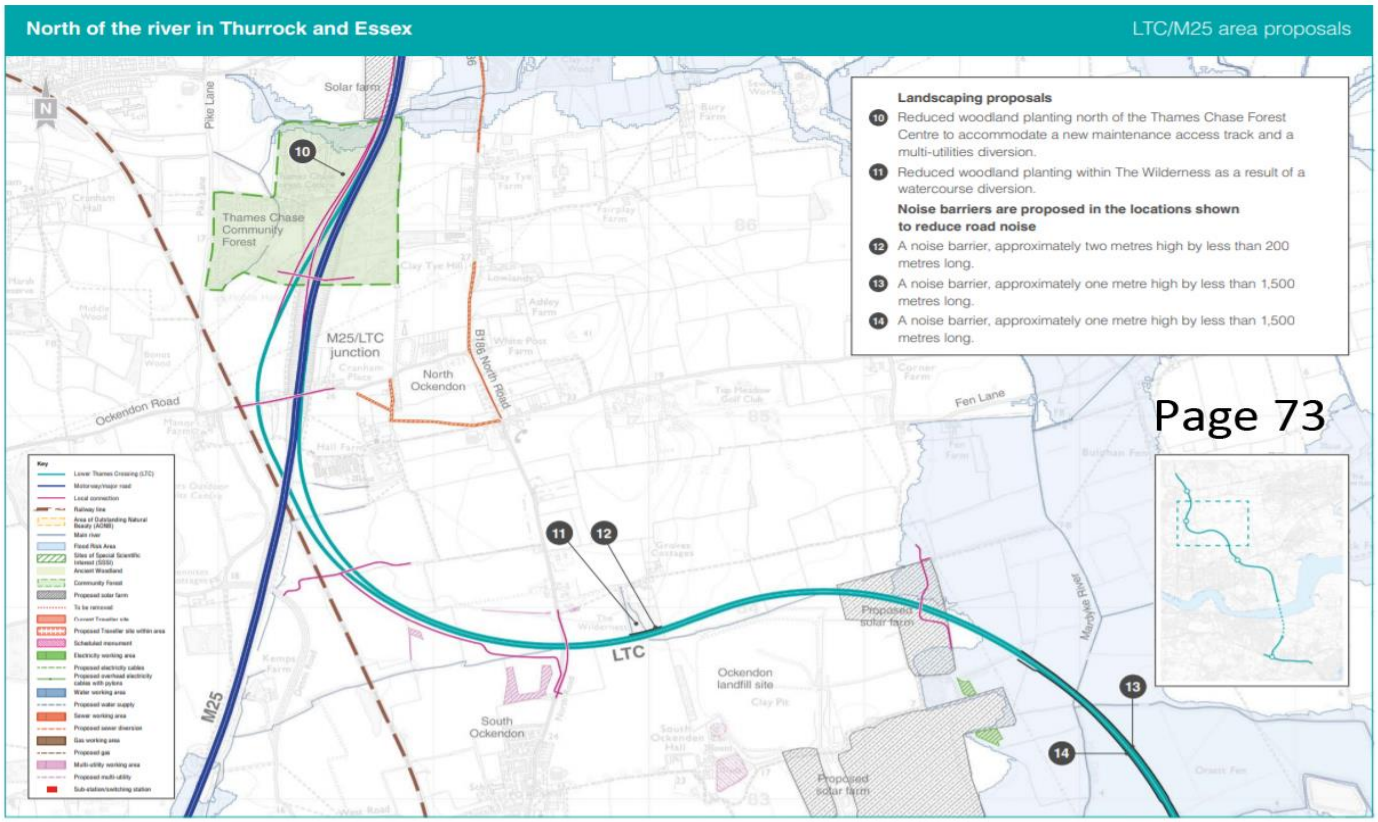
HE failed to provide adequate info on lengths of noise barriers. E.g. stating noise barrier is less than 1500m does not commit to anything, as the barrier could be 1m or 1499m.

They also refused to provide evidence of how and why the noise barriers locations were chosen as presented, simply stating the info would be available in the Environmental Statement at DCO. How

are we supposed to give meaningful responses when HE refuse to provide us with the relevant data for us to assess the level of noise mitigation?

Noise barriers were not identified adequately in the consultation guide and many were confused as two barriers, numbered 11 and 12 in the top image were actually the same barriers that were numbered as 13 and 14 on the map in the bottom image.





There was also some contradictory info regarding construction compounds. Previous confirmation that one compound would purely be an enabling compound, meaning it would be offices and welfare

facilities, has now changed to being told it would be a main construction compound, although this point was only identified due to residents questioning HE on the phone.

Additional inadequacies

Thurrock Council raised concerns over the lack of meaningful engagement by Highways England

HE rushed this consultation so soon after the previous Supp Con. They didn't even release any summary of the Supp Con before launching the Design Consultation, or detail any changes in the Design Con that were made as a result of Supp Consultation responses.

HE had not even finished analyzing Design Consultation responses, let alone had time to take them into account and incorporate any changes before starting to say about submitting DCO application. E.g. at LTC Task Force Meeting in late Sept they said they were unable to disclose outcomes of Design Consultation as they were still analyzing responses, yet at the same meeting told us they would be submitting their DCO application in October.

Poor communications

Yet again the Land & Property team failed to ensure letters were sent correctly, without errors. There were numerous residents who would be directly impacted by LTC who did not receive letters from HE as they should have during consultation. HE yet again just blamed Royal Mail, despite knowing that the service has caused them previous issues and was greatly impacted by COVID-19. General consultation info packs were sent using a signed for courier service, yet important letters from Land & Property were sent using a regular Royal Mail service. When residents realized and contacted HE about the missing letters, some as late as the day consultation ended, HE only gave a 1 week extension for them to respond to consultation.

2020 DCO (first attempt)

We know that the Planning Inspectorate were due to refuse the first attempt by NH to submit the LTC DCO application in 2020, partly due to concerns about the adequacy of consultation.

Many concerns were raised by host Local Authorities, and others including our group.

It has been two years since then, and we have experienced two more consultations. Yet far from using this time to hold an adequate consultation to put right the inadequacies of the consultation up until the first attempt of DCO, NH have again held inadequate consultations, and failed to provide meaningful engagement to so many, including the public, groups like ours, NGOs, and Local Authorities.

We do not believe that NH have even attempted to improve things, rather that we think things have, if anything, been worse.

Just one really obvious example of this is the fact that a host Local Authority, Thurrock Council, felt they had not option other than to submit a Freedom of Information request to obtain relevant info, the latest copy of the Outline Business Case. NH initially refused to share this, until Thurrock reported the refusal to the Information Commissioner Office (ICO), who instructed NH to release the requested information.

Since then NH have released a copy of the 2020 Outline Business Case stating that it is out of date and that the updated info will be made available within the latest DCO application documentation. We know that these documents will be uploaded as soon as is possible by PINS, but the fact is this is a further delaying tactic by NH, because they know the sheer scale and volume of documentation that is about to be published. If the information has been submitted to PINS as part of the DCO application there is no reason why NH cannot release the info immediately as it is complete.

2021 LTC Community Impacts Consultation

Consultation experiences

As we have sadly now come to expect when it comes to LTC most people have serious concerns over the adequacy of the LTC consultations, and this consultation was no different.

To begin with the timing of the consultation was dubious since it was held predominantly during the Summer Holidays, the first holiday following lockdown. With the children on school holidays, and people going away on holiday, this most definitely meant it was harder for people to have the time to review and consider the sizable consultation documentation, and respond to the consultation.

Due to the large volume of consultation materials we found it very difficult in the time given to fully and properly review and consider all the documentation available. It also meant that we were unable to submit questions as early as we would have liked. As a result, we have found ourselves in a position that the responses from HE to our questions largely only came back to us within a few hours of the end of the consultation. This did not leave us long enough to be able to review the responses, and be able to submit follow up questions, or include further comment in our response due to time restrictions of the consultation ending. In some instances people were told to submit their questions in the consultation responses, with no expectation of getting and answer.

It was questionable that HE chose to have the consultation during farmers busiest time of the year, especially when you consider the scale of the impact on agricultural land.

We and many others, including Local Authorities called for an extension to the consultation to allow adequate time to respond, yet HE denied us that option.

We learnt that at least one Local Authority was granted an extension on the consultation to allow them time to get their response through governance during Summer Holidays. If it is deemed ok to give them an extension because of Summer Holiday impacting ability to submit response in time, then the same courtesy should have been extended to all and the consultation officially extended for all.

The HE email to tell people about the consultation had a dud link it in that loaded the following:

highways england

We're sorry, this page cannot be found.

Email: info@highwaysengland.co.uk

General enquiries: **0300 123 5000**

Connect with us

Leaflets advising of the consultation were only sent within 5km radius. This is not adequate. The reminder postcards definitely did not reach everyone they should. It seems that many don't feel that they have had adequate notification of the consultation with details of events and how to take part.

We have been told that emails about the consultation were sent to all active DartCharge accounts/customers. However, many have stated that whilst they have accounts they did not receive the consultation email.

How can it be deemed acceptable to only send leaflets to those within a 5km radius of the route, but then send it to DartCharge customers who live further than 5kms from the proposed route? It is clear that many DartCharge customers are likely to support the proposed LTC simply because they are fed up with the issues at the current crossing, but not take time to review the actual consultation materials.

It is also very likely that many DartCharge users may not have been topping up their account due to COVID, and could possibly have missed out on being informed via DartCharge about the consultation. HE know that people's DartCharge usage would be different/affected due to COVID but it doesn't appear that this has been taken into account.

The events originally planned for the consultation did not include events in some key areas that would be greatly impacted, such as south of the A2, Chadwell St Mary, Stanford/Corringham, and the west of Thurrock.

For a Community Impacts Consultation all communities that would be impacted by the LTC if it goes ahead should have been provided with at least one consultation event.

It took pressure from LTC Task Force, Thurrock Council, community forums, TCAG and members of the public to put pressure on for the events that were eventually added and held for Chadwell St Mary and Stanford.

HE should also have prepared and published Ward Impact Summaries for all impacted areas, yet failed to publish Ward Impact Summaries for the Stanford/Corringham area wards.

It was announced from the beginning that printed consultation materials would not be available until at least a week after the consultation launched. HE should not have launched the consultation until all consultation materials were available in all formats for everyone.

There was a lack of inclusion of the Deaf Community in the public events, until such time as HE decided to have BSL interpreters along to the Chadwell event, which only took place due to pressure put on HE, else there would have been no public event for the Deaf Community with BSL interpreter.

There was very little promotion of the fact there would be a BSL interpreter at the Chadwell event.

Since Chadwell and Stanford events were added later after pressure, they too had little promotion, many were not even aware of events taking place in those locations.

There was also a lack of interpretation options for non-English speaking members of the community.

Some of the events were also too close to the end of the consultation which didn't allow adequate time for people to be able to attend the events, ask questions, get answers (or possibly still l have to wait for answers to be emailed or phoned through) and then respond. Some events being within a week of consultation ending.

We have concerns that there was not sanitizing of the touch screens and maps at events.

Some have still not been in a position to be able to attend events in person due to COVID, and additional risks through lack of sanitizing would reduce the likelihood of many attending.

People found the staff at events to generally not be very knowledgeable or helpful. They experienced the same problems as always with event staff not being able to answer questions. Instances of asking three different people the same question and getting three different answers.

People were being told wrong information at events, especially regarding the 24-hour working hours.

People told it was just the tunnels, when clearly it is far more than that.

There was a lack of 'experts' in certain fields at many of the events, representatives from the Environmental team were most noticeable by their absence at way too many events.
When the consultation packs finally started arriving it was apparent very quickly the sheer volume of consultation materials that formed this consultation. 8 weeks was not long enough to be able to properly review, consider, and respond to so much documentation.

It was also ludicrous the way printed materials packs were being sent out. We did not need three copies of everything, just to be able to receive a copy of each of the Ward Impact Summaries.

The consultation documents were not clear and informative as they should be.

We note that HE didn't make it clear that HGV movements need to be double to get a realistic figure, very misleading way to present such data.

There was a distinct lack of signposting as to where to locate information. Most of the time it was a case of just trying to hunt down the info you were looking for, if it was in there at all.

The webinars were not very helpful in general. So much pre-recorded content, but even though it had been pre-recorded there were still errors in those sections. Apparently, HE couldn't be bothered to provide a professional pre-recorded presentation.

There were sound issues with bad mics that created nasty sound issues.

The webinar viewing window kept resizing itself through the webinar. One minute you'd be watching full screen, then it would minimise and you'd have to open it back up to full screen again.

There was not adequate opportunity to ask questions and get answers in the webinars. Too little time was offered for answering questions.

Whilst the webinars were supposed to be detailed to particular areas of the route, HE just seemed to do what they wanted in them anyway.

In general HE just told people to go and hunt down the info they wanted in the consultation materials with little or no indication of where it may or may not have been found.

The content of the consultation materials has been quite technical at times. We feel that HE have likely taken sections of the first attempt to submit the DCO application and used it as consultation material.

We noted changes such as the development boundary now being referred to as the order limits, which definitely gives the suggestion that this is more technical DCO documentation/content.
We reminded HE that public consultation should provide clear and informative materials. We most definitely do not consider the Community Impacts Consultation materials to be clear or informative.

The interactive map was very glitchy and hit and miss as to whether it even loaded a lot of the time.

On some occasions we got messages requesting log in details be entered as though it was in some kind of admin mode. It was also completely down on other occasions too, as confirmed to us by HE.

At the beginning of consultation, the interactive map would not allow us to zoom right into areas without the red development boundary disappearing. It is also noted that when you zoomed in on the two closest levels of zoom on the map certain layers disappeared.

We are aware that some booked phone calls with the HE team, and that they ran out of time with the member of the team, who had to excuse themselves to attend another appointment. Whilst we understand this may happen whereby discussion can take longer than anticipated, the member of the team did not even offer to arrange a follow-on appointment, and instead seemed very keen to escape. In other instances people were told their questions were too technical for the NH team member to answer, and no provision was made to get the answers.

We note that there are numerous errors and mistakes in the consultation materials. Places wrongly labelled and mis-spelt. Some of these were still the same errors and inadequacies as reported in previous consultations.

When you consider some mistakes were wrong spellings and even wrongly labelled place names it is a concern as HE should have a better knowledge of our area than to be making such mistakes by now. Stanford spelt Stan**d**ford, and Sta**m**ford. Ockendon spelt Ockend**e**n. Horndon on the Hill being spelt Hordon on the Hill (missing an n) Brentwood being labelled as Brentford. Stifford Clays being labelled Little Thurrock.

Ward summaries not accurate on public transport, for instance Orsett Ward has more rail stations than just West Horndon to consider, there are others that NH failed to include.

HE have an obligation to consult us adequately, yet it seems even when we bring inadequacies to their attention they can't even be bothered to correct and improve them before presenting them to us again in the next consultation.

We also note that some online documents were updated during consultation apparently, as we noticed changes in file and URL names.

We heard that a local community radio station had been trying to get someone from HE to come on their station for an interview, yet HE ignored the requests. We find this unacceptable, especially during a community impacts consultation.

HE say they want to interact and do all they can to get word out about the LTC and consultations, yet they have not taken an opportunity to connect with the community via a local community radio station when approached.

We were not impressed by the attempts to greenwash the LTC.

As previously we found that HE presented information about the LTC in an extremely biased way, and with no focus on the negatives and realities of the project, always trying to put a positive spin on it.

Things such as the front page of the consultation website stating that LTC would improve air quality across the region is misleading and not a true representation, because once you dig deeper into the detail the evidence is there to show that many areas would see a worsening of air quality.

We found the Easy Read documents to be inadequate too.

Easy Read – You said, we did
Very misleading right from the beginning.

What people said about the first set of plans. Most people agreed with the plans for the Lower Thames Crossing. But the first set of plans did not have Option A as an option. The first question in that consultation was "Do you agree that we need a new crossing?" and then just asked for opinions about Option C.

People said "Instead of building more roads there should be better trains and buses. We Said – If there were more trains, there would still be too much traffic wanting to cross the River Thames. We need another road tunnel.

The second set of plans – We reduced the number of lanes between the M25 and A13. This would use less land and be better for the environment. No mention of the chaos that would cause when traffic needs to use that part of the proposed road and cannot cope.

In general we found it very patronising and only outlining the so called "benefits" and did not touch on the disadvantages that a new road would bring to all of the areas along the route.
The fact that this was only available online is not acceptable as it does not reach the people for whom it is supposed to inform about all of the aspects of the proposed Lower Thames Crossing.

Easy Read – Ward Summaries
This again was extremely patronising and only gave basic statements without actually telling people exactly what to expect which could really worry them.

Statements such as on Page 16 – Environment – We will give the land back when we have finished. Is totally insulting to anybody reading this.

There are lots of bus routes mentioned that will be impacted all along the route and people will worry if they do not understand what is going on and how to deal with things like that. Especially on page 67 – The 370 bus route would have to be changed,

There are glaring spelling mistakes – Page 58 - Ockendon as the title then – the new road will go round South Ockenden. It will then go between South Ockenden and North Ockenden. Then again on Page 62 – people will be able to see part of the road from South Ockenden. Page 63 – The new road will go around North Ockenden and join the M25 at a new junction between North Ockenden and Upminster. Then on the same page – we would expect delays on Ockendon Road. Then again on Page 66 – people will be able to see part of the road from North Ockenden. Some people will wonder if they are one and the same place and get very confused.

Easy Read – Guide to the Consultation
We find the following statement extremely hard to understand – Page 21 – digging a smaller tunnel south of the Thames so we can strengthen the land??

The Easy Read Guides are all very patronising, worrying, only available online as far as we are aware, which means they will probably not reach the people for whom they are meant to inform about this project, which after reading all of them we presume is people with special needs. We really think there is no excuse for the spelling mistakes as anything like that really could confuse somebody with special needs.

We question how people that may have wanted to view these Easy Reads would have known about them, as we did not see any promotion of them being available. It appears to be another tick box exercise for HE to purely say you have done it, rather than making a real effort for people to be aware.

That said we do not feel they were adequate or fair representations anyway.

To conclude on this consultation, we felt it was inadequate and misleading. The consultations just seem to get worse, not better, despite us repeatedly reporting issues.

2022 LTC Local Refinement Consultation

We rated the information being presented clearly as very poor.
We rated the website easy to navigate as very poor.
We rated the information videos on usefulness for understanding the latest proposals as very poor.
We rated the quality of the physical events as very poor.
We rated the choice of locations of the physical events are very poor.
We rated the promotion of the consultation and whether it was promoted to the right people as very poor.

Consultation timing

We would like to draw attention to the fact that NH/LTC only postponed their planned consultation which was due to take place earlier in the year, due to the level of opposition to their plans by Local Authorities.

Whilst we acknowledge that the consultation was postponed until May 12th through to June 20th, it should not have taken serious opposition and concerns from Local Authorities to have made this happen. NH/LTC are well aware that the timing they had proposed clashed with purdah for elections in Thurrock and Havering, as well as Easter Holidays, and was being proposed for a shorter duration, they should never have proposed such timing in the first place.

As noted below in regard to the consultation events, we are disgusted that NH/LTC lied to us and others about their further discussions with Local Authorities over the newly planned consultation details. Local Authorities were not consulted further on the new plans once the original feedback was offered on the original plans. The updated Statement of Community Consultation (SoCC) was only issued to them just before consultation began.

Whilst the consultation was postponed the timing still had issues for us and our supporters due to it still clashing with the time councils have been reforming after elections. It takes time for Local Authorities to reform and issue emails and contact details for new councillors for example, thus limiting options for the public to be able to reach out to their councillors if they needed/wished for help and support in regard to the LTC consultation.

The timing also meant that Thurrock Council's LTC Task Force committee did not get the usual attendance to one of our meetings during consultation because of the timing in regard to elections and council still reforming. This meant that the committee missed out on chances to not only have

NH/LTC in attendance at one of our meetings, but we also missed out on the opportunity to have a meeting within consultation to discuss the consultation concerns and issues.

There have also been bank holidays within the consultation period which has impacted the time people have had to respond to the consultation.

In general the length of the consultation, which was extended compared to the first proposed consultation, was still not long enough to be able to fully understand the proposals. It doesn't help that if you spend some time reading the consultation materials from the beginning of the consultation and then submit your questions via email, it then takes up to 15 working days to receive a response. We found that the responses we did receive avoided answering many of the questions we had, and/or needed further questions to be asked to seek further clarification, as in some instances the responses just added to the confusion and generated more questions. Since many of the responses to our questions came in on Thurs 16th and Fri 17th June it left us with inadequate time to be able to read them, respond and expect a response with time to consider any info that may have been provided, and get a response to the consultation in before it ended. We therefore had to respond as best we could with the info we had and what we have gathered from the confusing, contradictory and inadequate consultation materials.

As we were finalising our response we were still receiving replies from NH/LTC in response to the questions we have submitted. One of the emails we sent on the 5th of June and it has taken until 9pm on the 20th June, just a few hours before consultation is due to end, for a reply to be sent. This is again inadequate, and again highlights that the consultation was not long enough to give opportunity for materials to be reviewed, questions to be submitted, and responses be received with adequate time to be reviewed and considered before responding to the consultation, and indeed leaving no time to send follow on questions if needed, which is often the case when dealing with NH/LTC.

We also seriously question the timing of this consultation considering that the nitrogen deposition surveys, and updated air and noise pollution surveys and assessments have not yet even been completed so could not be shared with us or Local Authorities. Such important information should be complete and presented to us for consultation.

We believe that NH/LTC rushed to have this consultation as time is ticking away, and they need to attempt to resubmit their Development Consent Order (DCO) application as soon as possible. So rather than taking the time to consult us with completed adequate info they have instead just pushed ahead and rushed into yet another inadequate consultation.

Consultation promotion

We heard from people who did not receive a leaflet advising of the consultation, they only knew it was taking place because we had alerted them.

The promotion of the consultation was yet again carried out in a very biased way that did not ensure fair representation of the proposals. The interviews/articles that we heard and read presented the project in a very biased way in favour of the crossing, with misleading information to try and garner and keep support. It is not right for the LTC Project Director to be attempting to give the impression in interviews things like electric vehicles will sort air pollution issues, when the reality is that electric vehicles still emit deadly PM2.5. Or that he doesn't know where Thurrock Council came up with the 4% reduction at Dartford Crossing figure, when the council had approached NH/LTC prior to going public with the info and NH/LTC didn't comment on it until it was in the public domain.
We also question how you can issue a Non Statutory Statement of Community Consultation (SoCC) as an addendum, that when we questioned you we were advised is an addendum to the original SoCC. How can a non statutory document be an addendum to a statutory document?

The Cambridge Dictionary defines addendum as - *something that has been added to a book, speech, or document*.

This therefore suggests that an addendum of a statutory document would be statutory by association, as it forms part of/has been added to the document.

We therefore also question NH claims that it was not a statutory consultation.

We also highlight that since NH also still have the obligation to consult those who have recently become statutory consultees, the information presented in this consultation is far from adequate, especially the lack of key layers on the interactive map and similar.

We also have concerns that NH did not feel it important or relevant to list details of the consultation events within the Consultation Guide, instead putting the onus on the reader to email or phone for details of events. We again do not consider this to be clear and informative communication or promotion of the consultation.

Consultation events

Yet again we have serious concerns about the lack of and timing of the consultation events.

Despite us and others, including at least one Local Authority, voicing concerns that there were no events in certain areas, NH only added one more additional event in East Tilbury.

Why an event in East Tilbury was not included in the first place is completely incomprehensible considering the huge impacts the proposed LTC would have on the area. Not only that, but the fact that the changes in this consultation related to things like Tilbury Fields and the Operations and Emergency Access Point that directly impact East Tilbury area.

Whilst an event did end up being added, it was not listed on the consultation leaflet, and so many would not have been aware that there was even an event in East Tilbury to attend. This is simply not good enough.

Other areas like Chadwell St Mary, South Ockendon, areas south of the A2 should also have warranted consultation events, but NH failed to provide them.

Again, changes in the consultation were relevant to both these areas, so there is no reason or excuse not to have provided events.

The photo point used for the image of the proposals to change the landscaping around the A13/A1089/Baker St area of the LTC was added as a photo point to the interactive map in a location within Chadwell St Mary. The addition of the Orsett Cock to A1089 south connection would also impact Chadwell St Mary since one of their major access routes in and out is via the Orsett Cock, which would see a large increase in traffic movements as a result of this addition.

There were changes to the level of the LTC within the cutting in South Ockendon, changes to landscaping around the LTC, and changes to utilities including newly proposed larger electricity pylons that would be visible across the fields from South Ockendon and impact the local area and views.

We also have serious concerns that NH/LTC were attempting to tell us and others that the events had been decided after discussions with Local Authorities.

We are aware that this is a complete lie, since NH/LTC did not further consult with or seek feedback from Local Authorities for the newly proposed consultation. We know that Local Authorities did not receive the updated Statement of Community Consultation (SoCC) until just before the consultation launched. They certainly were not consulted on the newly proposed consultation.

We find this to be completely unacceptable and arrogant behaviour to blatantly lie to people, including councillors by saying that the events were decided upon after discussions with the Local Authorities. This just shows the level of contempt NH/LTC have for our Local Authorities and our communities, as well as their complete lack of respect by trying to additionally lie to us. We consider this to be disgraceful behaviour.

All the events took place between 2pm and 8pm on weekdays. There were no weekend events, and the timings mean that anyone who works shifts would not be able to attend.

The feedback we got from those that attended was that the events were as always a lot of propaganda, with different answers to questions and levels of knowledge and understanding depending on who you spoke to at the event. There were reports that the relevant LTC team member for certain areas were not available at some events, which resulted in there being nobody present at some events to answer questions on some aspects.

In general people are fed up and fatigued by the consultations and events, and have little or no confidence in NH/LTC to provide adequate information, instead feeling that NH/LTC are simply on a propaganda mission with no real interest in those that have serious concerns.

Whilst we welcome the inclusion of British Sign Language interpreters at two of the consultation events, we are frustrated that firstly this was not arranged prior to the consultation so that this could be included without promotion of the consultation. And secondly, that British Sign Language interpreters were not available for the Deaf Community at all the consultation events.

Consultation materials

NH/LTC have a legal obligation to provide us with clear and informative materials and an adequate consultation. Yet the materials presented in this consultation are anything but clear, informative, and adequate.

We also get the impression that it may be an attempt to create materials that are as confusing, misleading, contradictory, and inadequate as possible in the hope that along with consultation fatigue it would put people off of responding to the consultation. We know that NH/LTC have to be seen to log, read, and analyse all responses, and we are aware that the more responses there are the longer this will take (or be seen to be taking), which goes against the aim to resubmit the DCO as soon as possible. It is public perception that the consultation materials have been designed to put people off taking part.

There is so much info that contradicts itself in this consultation. You can literally read one thing in one sentence and then read something in the next that completely contradicts it.

In the Community Impacts Consultation NH/LTC provided images of the proposed Chalk Park[19] that shows land forms in the design. Yet in the Local Refinement Consultation Guide on page 40 (page 37 pdf numbering) National Highways state, "*The existing ground level would be maintained*...".

When we questioned NH/LTC we were told, "*Chalk Park will be created using spoil volume taken from the Gravesend cutting (the tunnel spoil will be going to the Tilbury side only). The total volume of spoil used to create Chalk Park will be* ***2,000,080m³*** *for the current design. The proposed height will be approximately 15m above existing ground level*". Just one of many examples that show how misleading and inadequate their consultation materials are.

In February 2022 NH/LTC held info events, at the time they released new walking, cycling, horse riding maps. They originally uploaded and linked to maps for Thurrock that showed some of the changes that have been revealed in the Local Refinements Consultation, such as the Operations and Emergency Access Point, and newly arranged Tilbury Fields. After realising the error, and since they did not want to reveal these new details the map was changed to one that did not highlight the changes.

However, now that the changes have been revealed as part of the latest consultation the maps have not been updated. Therefore, the maps for Thurrock on the LTC website[20] still do not show the latest changes like the Operations and Emergency Access Point.

NH have never clearly shown the fact that the already busy A2 would drop 2 lanes to just 2 lanes for sections, it was only spotted with very careful and close scrutiny of zoomed in maps.

There is also the inadequacy that NH/LTC are trying to claim 'new' paths when the reality is that the routes exist and are being used now in many instances. Just because NH need to realign a bridge or road doesn't mean the path that it currently includes can be claimed a new when it is realigned. This kind of misleading info is totally unacceptable. We can only assume this is being done to try and manipulate the active travel count in an attempt to make the project look better than it truly is.

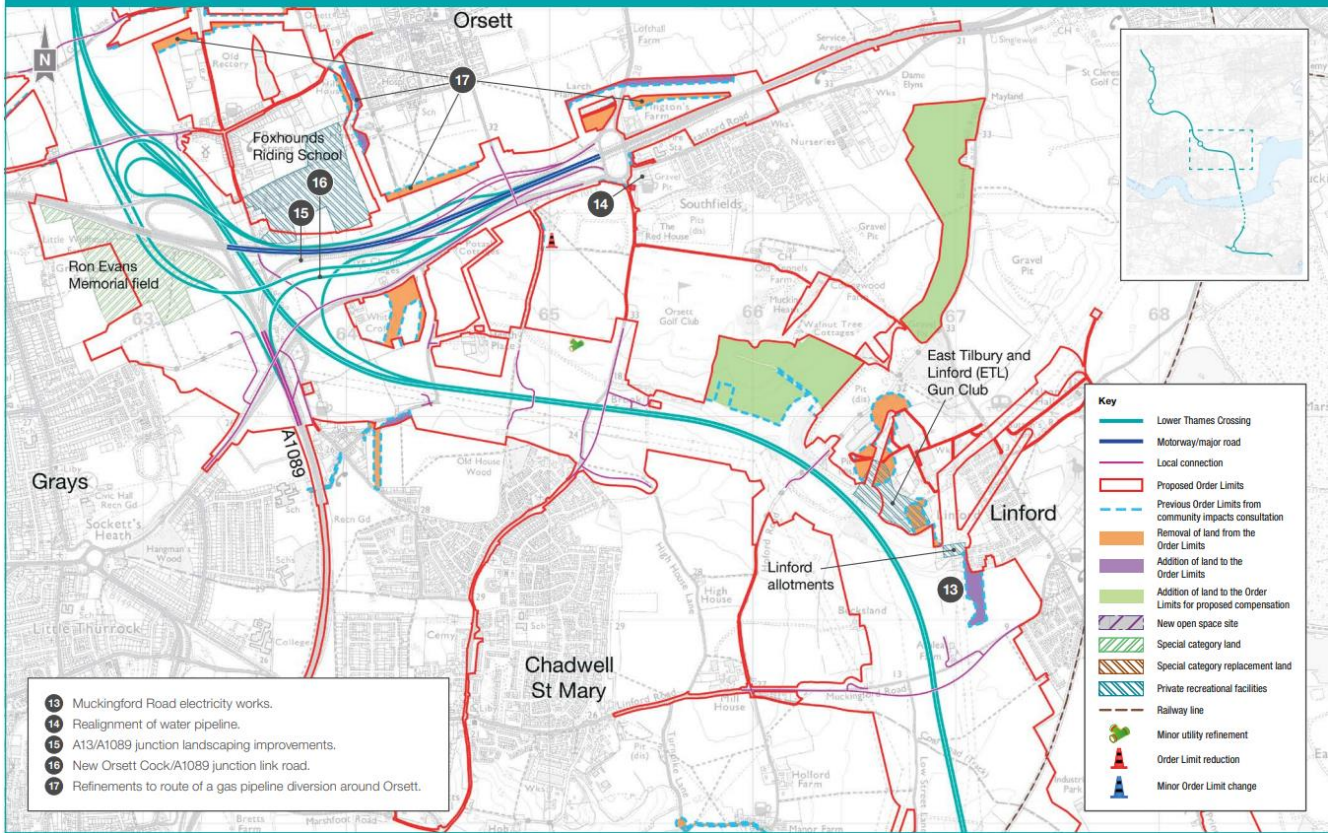
NH also refuse to share details of things like PRoW widths and surfaces. How are we supposed to get a clear picture of what is being proposed without such info, or give meaningful response as to whether it would be acceptable? All we have been given is simple lines on basic maps.

19 [redacted]
20 [redacted]

In the Consultation Guide on pages 58/59 (page 54/197 pdf numbering) the map shows the labelling for Point 14 pointing outside of the development boundary. This is confusing and misleading.

Chapter 5 in the Consultation Guide was largely repeated in the Nitrogen Deposition Appendix (AP1). This is not only a waste of pages at additional cost that could have been saved, as well as having additional environmental impacts, it was frustrating and time consuming as we had to try and pick out what additional information there may or may not be within the Appendix.

Figure 4-14: A13/A1089 junction



There are still errors in the Map Books, many which we have commented on time and time again in our consultation responses. We take it that NH/LTC are either not adequately reviewing the consultation responses and taking them into account, or just simply don't care that there are errors.

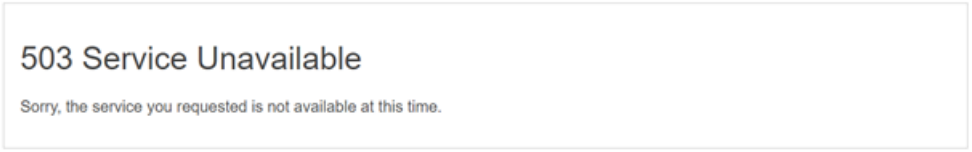
For instance, Stifford Clays is being labelled as Little Thurrock in Map Books 1 and 2 on sheet 27. Stanford-le-Hope is still being labelled as Standford-le-Hope on sheet 28, there is no d in the middle of Stanford. Sheet 33 points south to Little Thurrock, when it should read Stifford Clays.

In Map Book 1 on sheet 40 South Ockendon is labelled pointing eastwards, which is incorrect. Yet the same sheet in Map Book 2 points to the South when labelling the direction for South Ockendon.

In Map Book 2 on sheet 50 both Gravesend Road and Green Farm Lane are labelled, yet on the same sheet in Map Book 1 there is no identifying labelling at all.

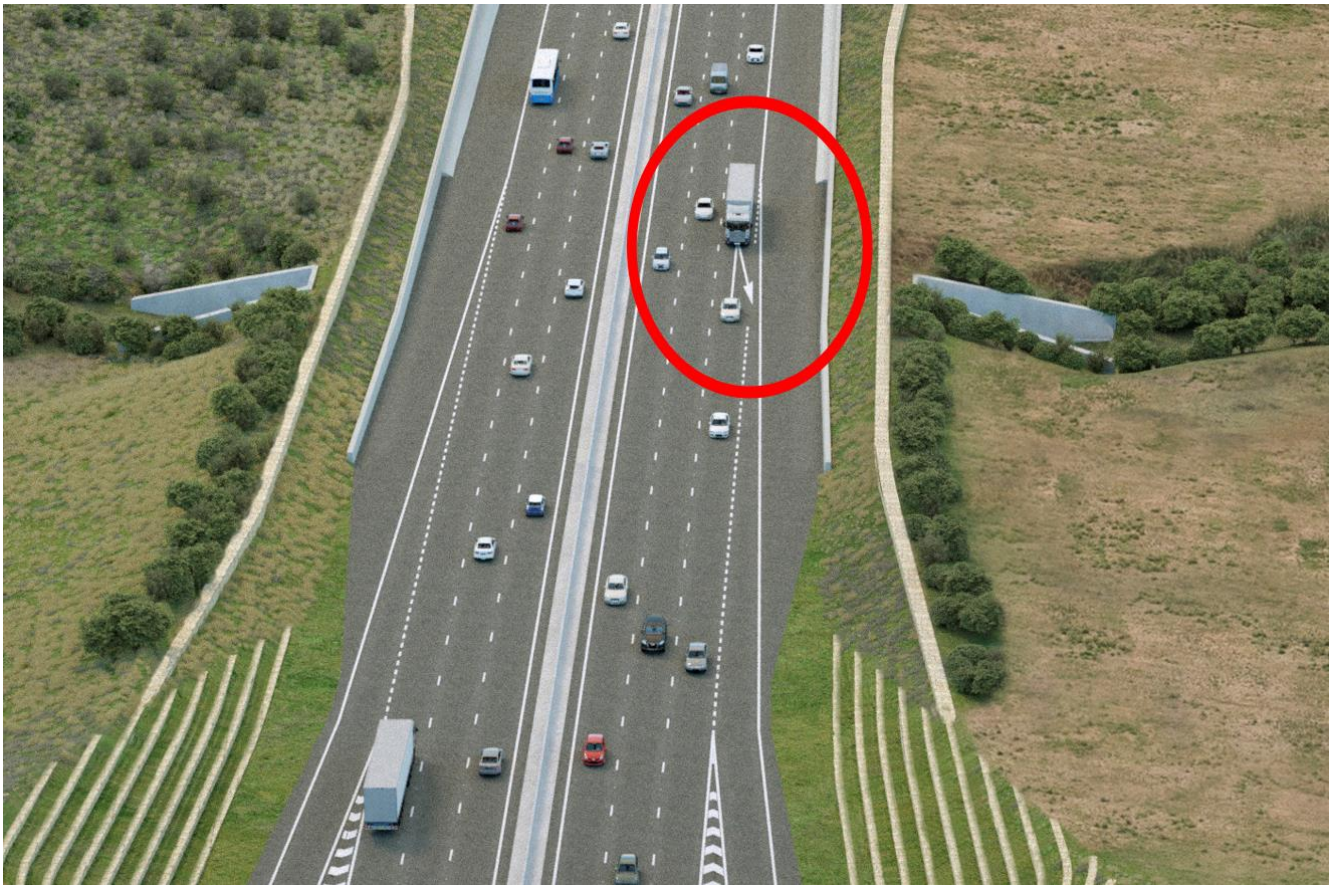
In Map Book 3 sheet 13 the LTC connection to A13 eastbound and Orsett Cock junction is labelled as 2 lanes, when in fact it is now proposed to be 3 lanes.

Again, does anyone check anything?
We would also highlight the fact that we needed to request physical copies of the Map Books as the online versions are now so large they are slow loading and glitchy. We also experienced an intermittent 503 Service Unavailable message prior to receiving the physical copies of the Map Books.



Whilst we were in a position to refer to the physical Map Books once they were received, others would not have been in the same position, so would have been struggling with accessing the Map Books online, which as previously mentioned are large size and therefore slow and glitchy.

The images provided are also misleading, such as the new image of the northern tunnel portal and surrounding Tilbury Fields proposal. Despite NH/LTC telling us the operations and emergency access point would be purely for operational and emergency vehicles the image shows a left filter lane arrow.



This arrow representation is an error by NH own admission. It again highlights how little care and attention they give to the information they are sharing.

The same image also lacks any representation of the perimeter fence that would surround the portal and access point, which is misleading as it is representing the area as open when the reality would be some kind of high security fencing barriers.

We have not been provided with updated info/data for traffic modelling to reflect the predicted Thames Freeport traffic.

Neither have we been provided with the latest air and noise pollution information, because the assessments haven't even been completed.

Consultation videos

For a time, the consultation video for Thurrock, Essex and Havering (Part 2 of 2) was actually one of the Kent videos that had presumably been uploaded in error.

You can see now that the Thurrock, Essex and Havering videos are presented by a male presenter and the Kent ones by a female presenter. Also, if you check the time on the image below and then check the video as it is now it is clear the video has been changed.

Consultation letters

We are aware that some residents did not receive their letters from the LTC Land & Property Team until days after the consultation began. We acknowledge that further letters were sent apologising and offering a 2-day extension to respond. However, this is not the first time such delays/errors have occurred at consultation, and it is clear to us that lessons have clearly not be learnt, or safe guards put in place by NH to ensure this kind of thing does not keep happening.

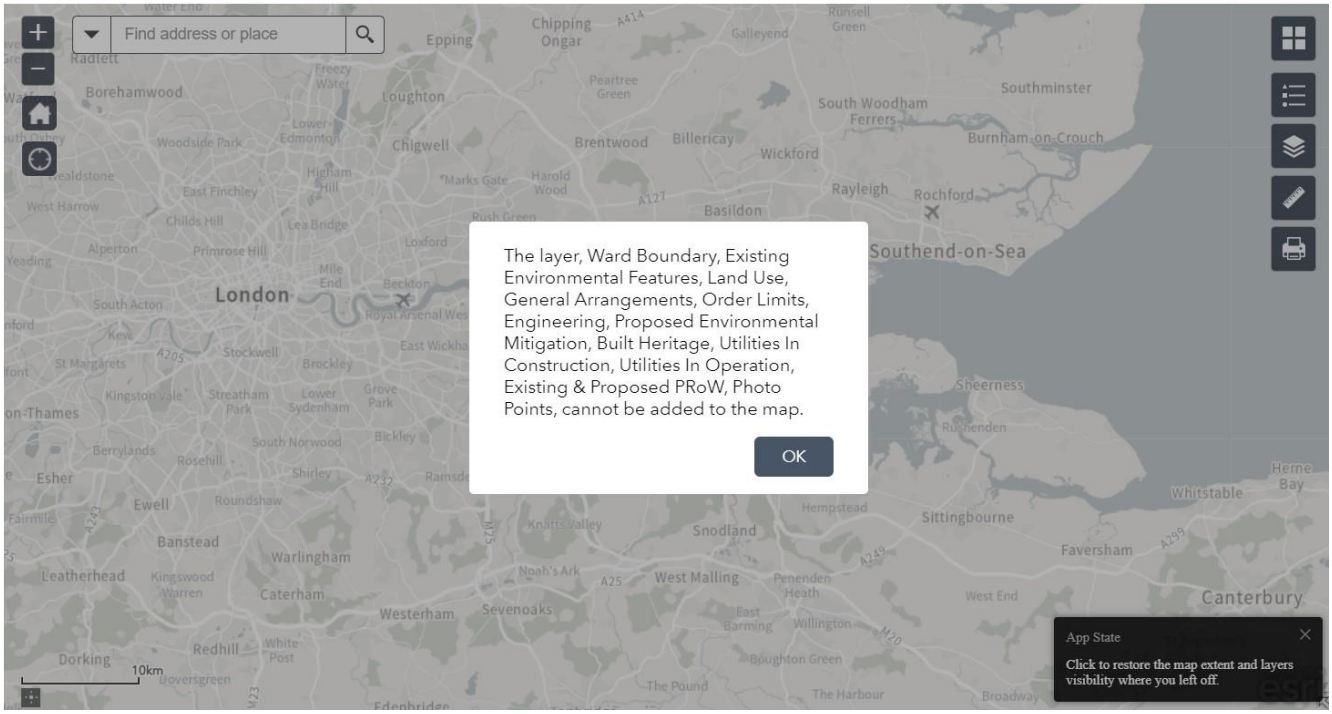
We also add that the apology letters arrived more than 2 days late. Residents in a position to be receiving letters from the LTC Land & Property Team are highly likely to be stressed enough with the threat of LTC on their lives, property, land, they do not need this additional stress and inconvenience of having to contact NH to request longer to respond. It also shows a lack of duty of care to people that NH keep allowing these mistakes to happen consultation after consultation.

Interactive map issues

Errors

We have had to report many issues with the LTC interactive map. It has ranged from glitchy issues to the map being completely inaccessible and displaying error messages. We have reported at least two

different instances of this, and since it has happened to us we can only assume others will likely have also experienced such inadequacies at other times also.



Missing Layers

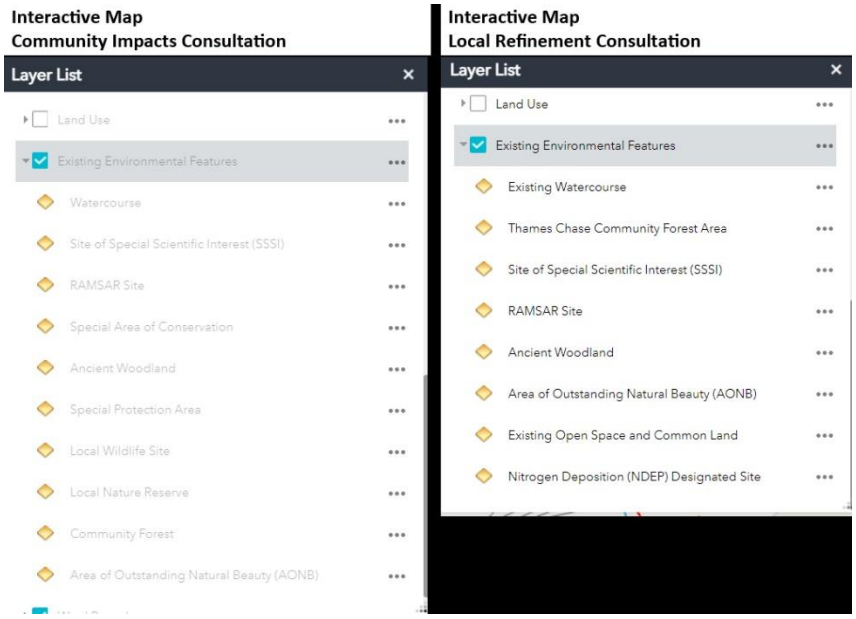
The interactive map does not show:

- the construction layers, ie compounds etc.
- the location of veteran and ancient trees
- the traffic layers
- air quality layers
- noise and vibration layers
- the geology and soils layers

When we asked about the missing layers we were told that some layers were not present, and we were provided with links to both the current and the previous version of the interactive map. We do not consider it adequate that we are told to review two different versions of the interactive map to try and gain an overall image of what is being proposed. Why were all the layers not displayed in the latest version of the interactive map?

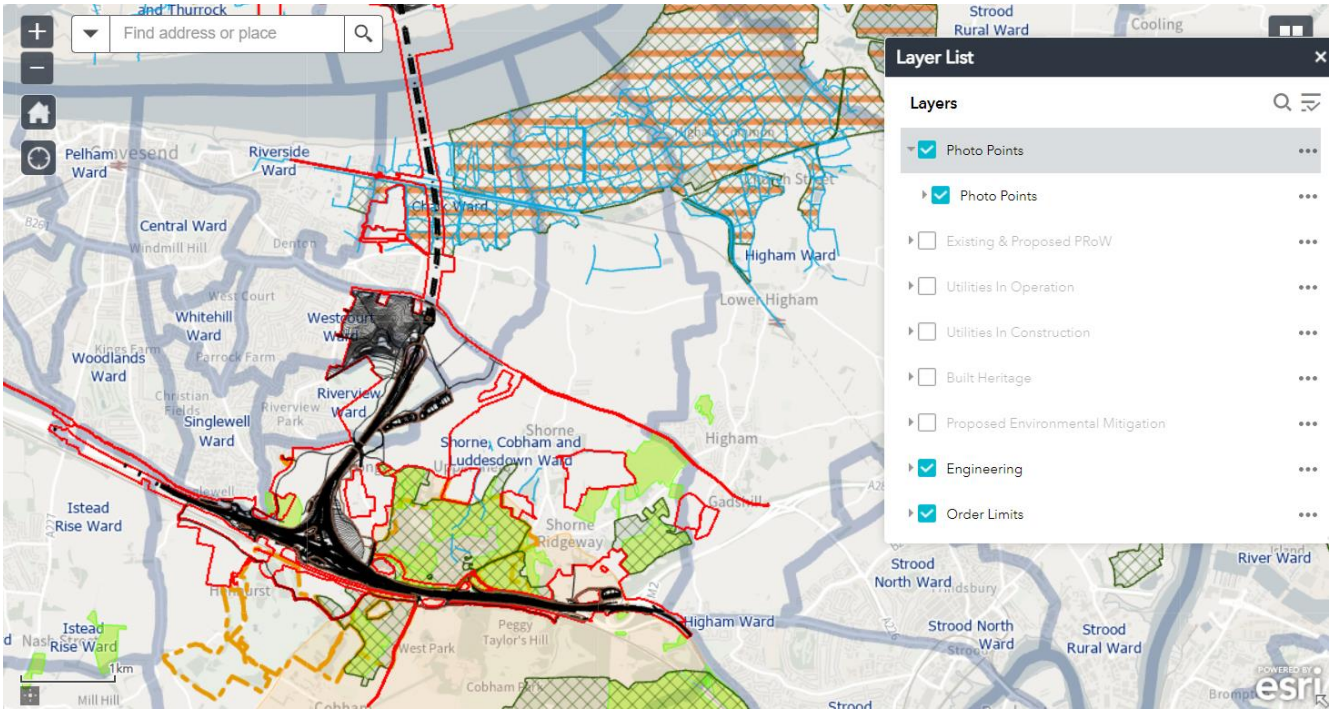
In addition to this we were told that the interactive map layers for Environment were the same. As can be seen in the image below showing screen captures of the Existing Environmental Features layers in each of the consultations they are not the same.

Why were layers such as ‘Special Area of Conservation’, ‘Special Protection Area’, ‘Local Wildlife Site’, ‘Local Nature Reserve’ not detailed on the latest interactive map?



Missing content

Why did the latest version of the interactive map not show any photo points south of the river? We again state that the interactive map should provide a clear and informative presentation of what is being proposed. The lack of images south of the river is not helpful when trying to better understand what is being proposed.



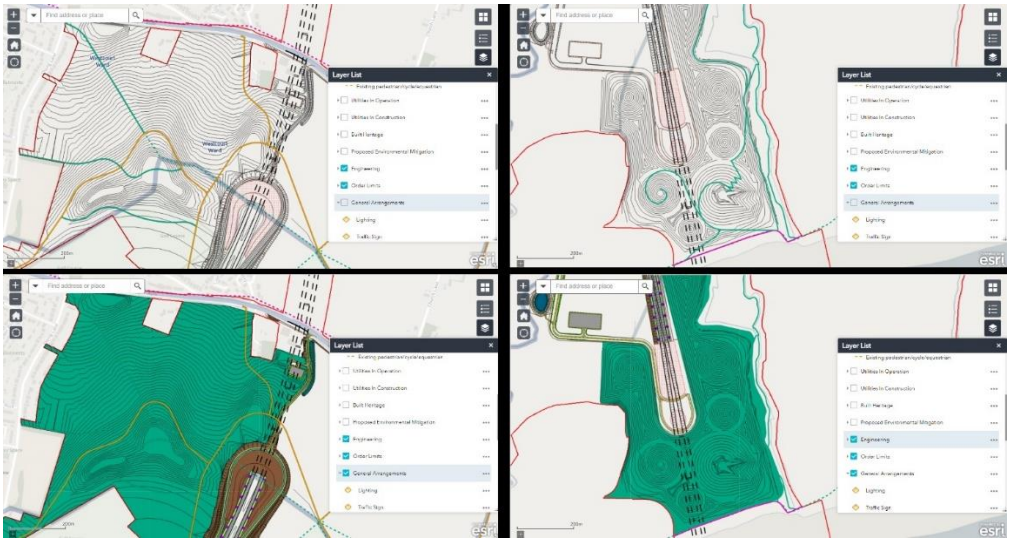
Legend colour confusion

We certainly do not consider the interactive map a clear and informative resource for consultation when the same colour is being used for the Proposed Pedestrian Footpath in the Existing and Proposed PRoW layer of the map as Proposed Earthwork Landscaping in the General Arrangements tab.

The images below highlight the issue this causes when trying to view locations such as Chalk Park and Tilbury Fields. Both have proposed pedestrian footpaths running through the proposed earthworks landscaping areas.

If for any reason you turn off the Engineering layer the issues are even more obvious as the two layers simply blend into each other.

This is not clear or informative.

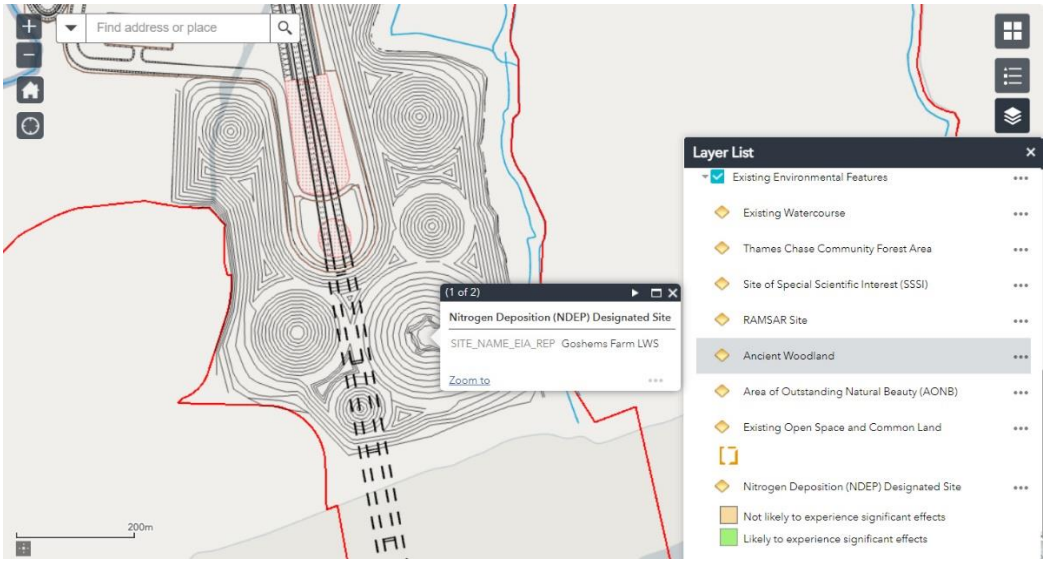


There are instances on the interactive map when the Existing Environmental Features tab is selected whereby you click on a certain area, such as Goshems Farm within the proposed Tilbury Fields area and it is labelled as a Nitrogen Deposition Designated Site. Yet it is not shaded as either 'Not likely to experience significant effects' or 'Likely to experience significant effects'. (See image below). The fact this is not colour coded in line with the map legend is misleading and adds to the confusion.

If you refer to 'Figure 5-1 Locations of designated sites likely and unlikely to experience significant effects' in the Consultation Guide or on the Consultation website it appears to show this location detailed as an area that would experience significant effects.

We say appear, since the map provided in both instances, in the guide and on the consultation website, are not a high enough resolution to be able to zoom in to see enough detail. This adds to the issue that the layer is not displaying correctly on the interactive map.

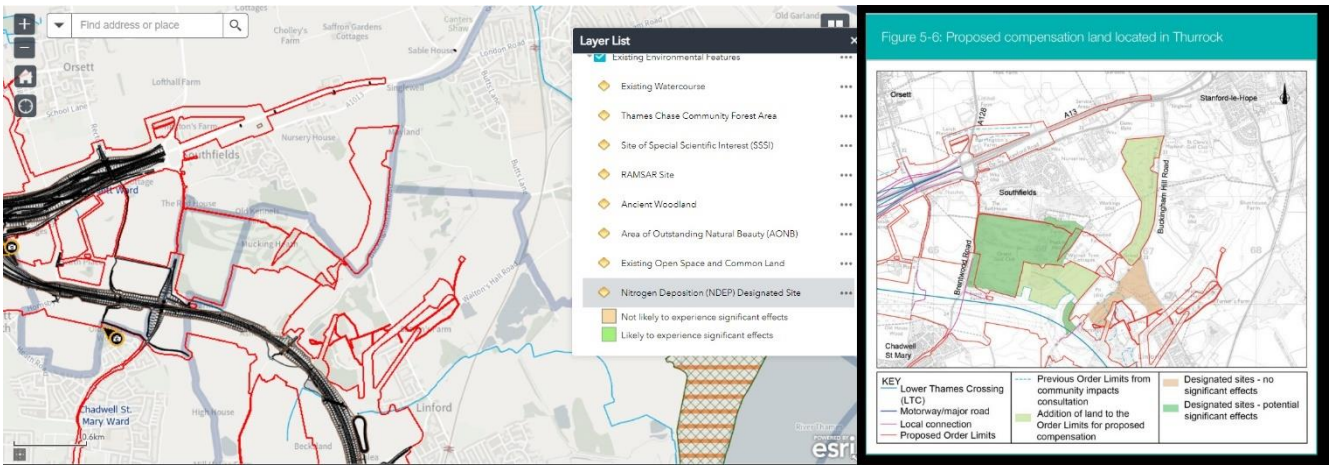
We did ask for a higher resolution version of the maps that show the nitrogen deposition designated sites, but we were told the only maps available in this consultation were in the guide and on the website. We find it unacceptable and inadequate that National Highways are unwilling to provide this information to us at a quality that is adequate to view properly.



As far as we can see the colour shading to represent whether Nitrogen Deposition Designated Sites is likely or unlikely to experience significant effects is missing from the interactive map.

For instance, compare the image below. The interactive map is shown on the left, and 'Figure 5-6 Proposed compensation land located in Thurrock' from the Consultation Guide and consultation website is shown on the right.

The image to the right shows that two areas are marked in the darker green depicting 'Designated sites – potential significant effects'. Yet with the Existing Environmental Features layer on the interactive map the same areas that would experience significant effects from nitrogen deposition are not highlighted in the green colour as they should be.



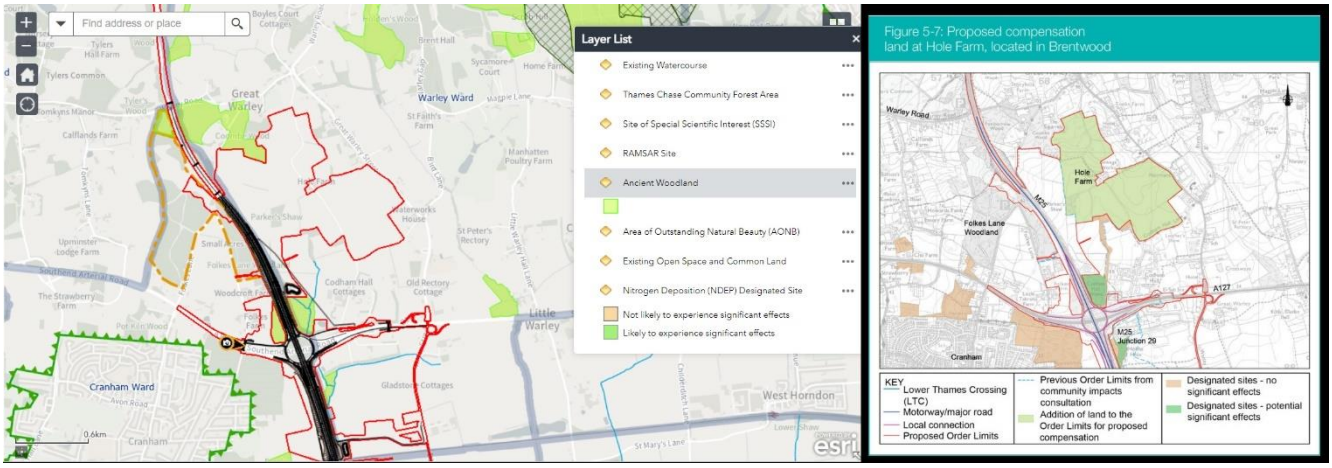
It gets even more confusing when you try to view the same info for other areas, because not only are they not colour shaded as above instances, but some are also ancient woodland which uses a very very similar shade of green for the legend.

This is particularly an issue when there are other shadings for other details overlayed. For instance with the hatching over this section of green, which we believe to be the same shade of green the shade of green has the illusion of being different.

But when you consider that some Nitrogen Deposition Designated Sites are both 'Ancient woodland' and 'Likely to experience significant effects' for nitrogen deposition, it gets even more confusing, especially when it appears that the 'Likely to experience significant effects' layer of shading doesn't appear to actually be active on the map even when the layer is selected.

See the images below which shows other Nitrogen Deposition Designated Sites that are both ancient woodland and likely to experience significant effects of nitrogen deposition.

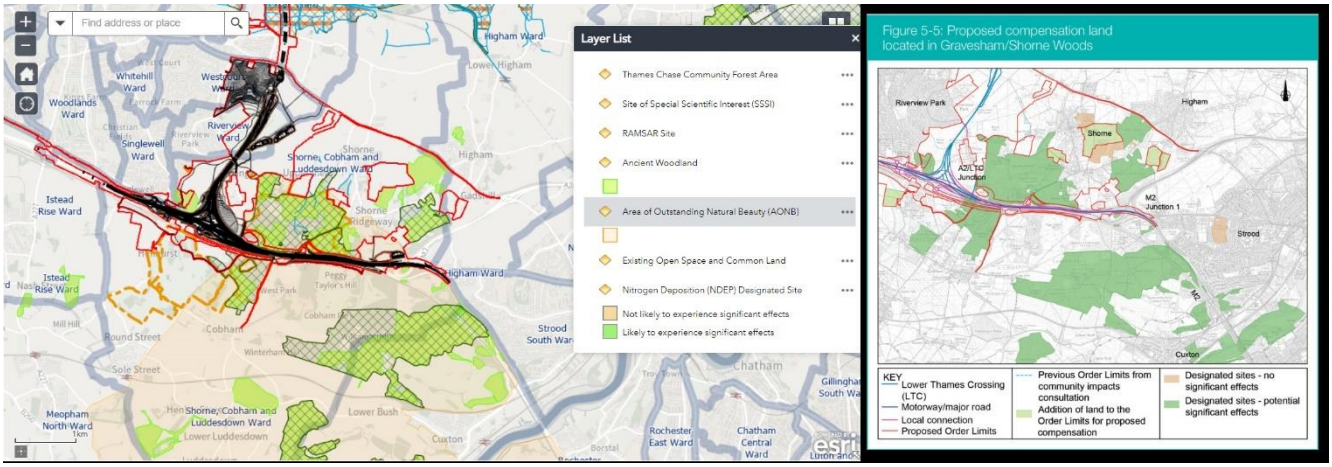
Firstly, 'Figure 5-7' alongside the interactive map showing the Hole Farm area.



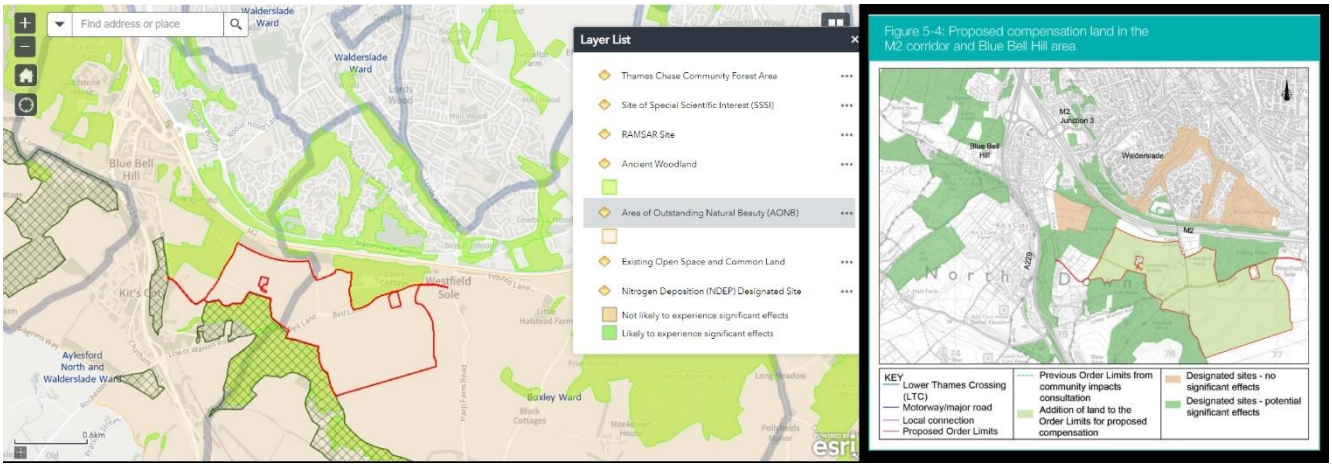
Not only that but when you move south of the river it becomes apparent that the colours used to represent ‘Area of Outstanding Natural Beauty (AONB)’ and ‘Nitrogen Deposition Designated Sites unlikely to experience effects’ are also extremely close in shade.

For instance, see the images below that show both these categories in the same vicinity and see how confusing it gets. This is magnified even further since some areas that should be colour shaded to represent ‘Nitrogen Deposition Designated Sites not likely to experience effects’ are also ‘Ancient woodland’ which as above is confusingly shaded in a similar green to ‘Nitrogen Deposition Designated Sites likely to experience significant effects’.

This is the case in the Gravesham/Shorne Woods area, see below. ‘Figure 5-5’ alongside the interactive map for the Gravesham/Shorne Woods area. Starmore Wood is shaded green on the interactive map to represent ancient woodland. But that green is also very similar to the green to depict that a designated site that would likely experience significant effects of nitrogen deposition. When if you refer to Figure 5-5 this site should actually be shaded to represent a designated site that would not likely experience effects.



There are similar instances in Figure 5-4 around Blue Bell Hill area, as seen in the image below.

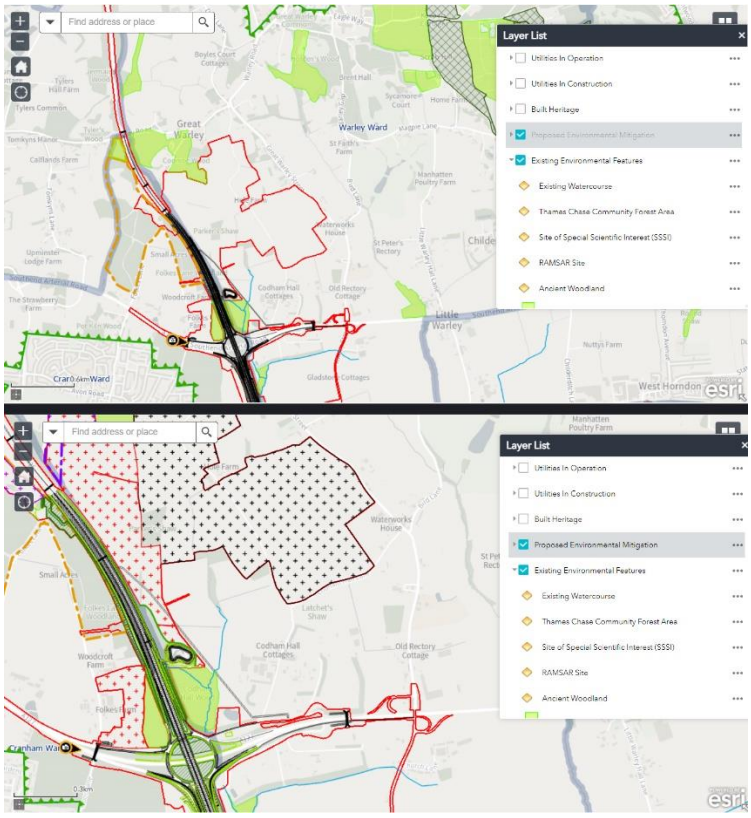


We'd like to say that the above clearly shows the problems, but we appreciate that it is not easy to actually explain it easily in words even with the screen captures, because of just how confusing and misleading it all is with the similar shading and missing layers.

This can in no way, or form be considered clear, informative, or adequate.

We also note that there is no stability in what is shown with layers selected depending on how far in or out you are zoomed. As shown below both the Proposed and Existing Environmental layers are selected. In the top capture the 'Existing' layer displays but not the 'Proposed' layers. If you click to zoom in once more both layers are then displayed.

We have found this to be an issue during consultation since the interactive map was introduced, some layers seem to vanish and appear depending on how far zoomed in or out you are with no apparent standard.



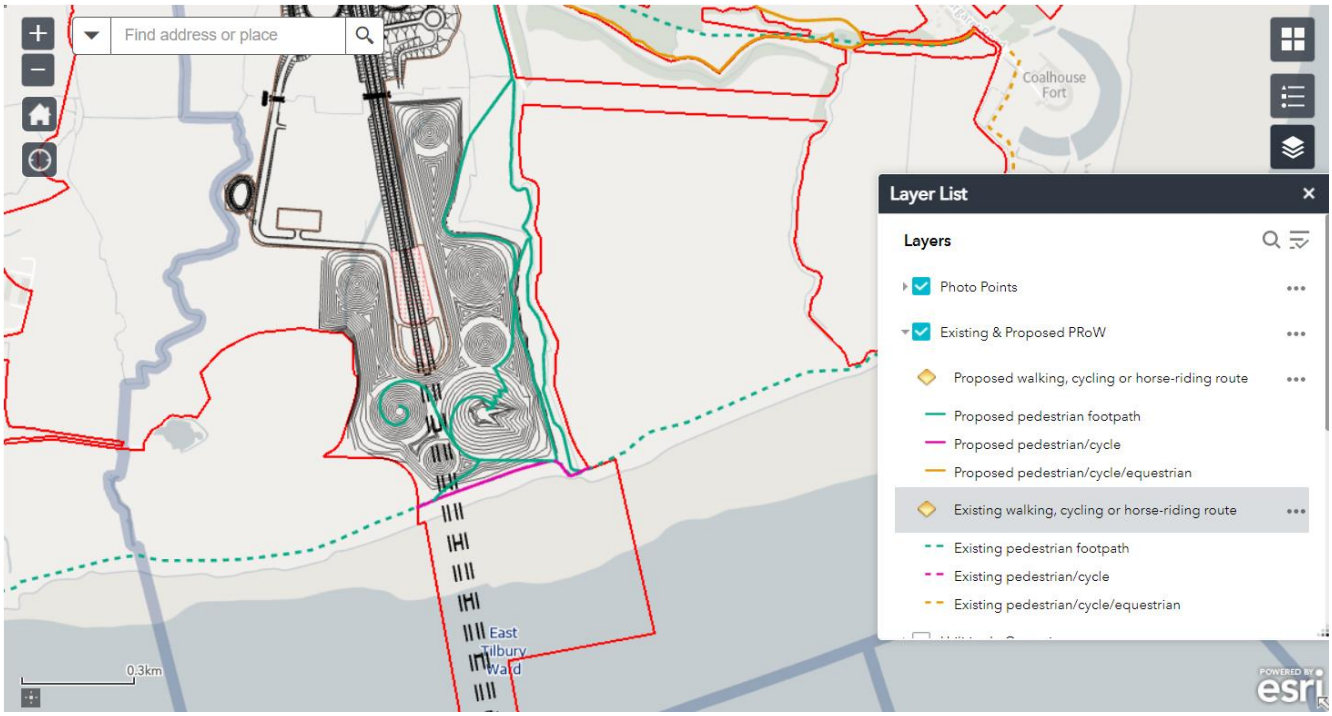
Incorrect info

There is a section on the interactive map along Two Forts Way that is detailed as a new cycle route. Firstly, this would not be new as there is currently a path there, it just needs repairing.

Secondly, the interactive map is showing the path either side of the section marked as a proposed cycle route is detailed as existing footpath, not cycle way. The information represented on the

interactive map does not match the info provided in the Walking, Cycling, Horse Riding maps on the LTC website[21].

This is misleading and confusing, and even if it were a true representation it would lead to the question of how people get their bicycle to that short section of cycle path. It has to make you wonder if anyone actually bothers checking this info as it is being prepared.



Interactive map conclusion

We have come to the conclusion that the interactive map in the Local Refinement Consultation is confusing, misleading, and inadequate. It can in no way be considered clear or informative. There are likely other inadequacies and errors too that we haven't yet come across as we are still reviewing info. We have no confidence that there will not be other errors and inadequacies that we discover.

Since many people like to use the interactive map to focus on specific areas, and try to get a better overall understanding of the project and its impacts, we find it totally unacceptable that there are so many issues that make it impossible to get a clear and informative view of the proposed LTC using the interactive map.

[21] [redacted]

Avoidance tactics

There are many aspects of the proposed LTC that we have been asking questions about for years now and NH simply refuse to share the information being requested.

Much of the time the response is that the information will be available within the Development Consent Order (DCO) documents.

We are aware that the DCO documents will total tens of thousands of pages, that everyone will have limited time to review and respond to. We believe NH are purposely avoiding sharing key information with us and others as they know we will be overwhelmed by the sheer volume and complexity of the DCO documents.

The information we are seeking would allow us to better understand what is being proposed and to be able to make more considered responses to the consultation.

Examples of such information that we are being refused:

- How much greenbelt land would be lost/impacted
- How much agricultural land would be lost/impacted, and what grade land is in each category
- How much woodland and how many trees would be lost and impacted, and how much of that would be ancient woodland, and how many ancient and veteran trees
- How much hedgerow, ancient hedgerow would be lost and impacted, and how much of that is protected and species rich
- How many waterways would be lost and impacted
- How much marshland and fenland would be lost and impacted
- What SSSI would be lost and impacted
- How many homes and businesses would be lost and impacted
- Details of habitats and species that would be lost and impacted
- Up to date air and noise pollution details
- Projections for impacts to health and wellbeing
- The estimated cost of the project
- The estimated economic growth/benefits of the project

It is mentioned in the consultation that NH have made changes to the proposed water vole habitat. Yet when we asked for details, and we couldn't find any in the consultation materials we have been told that it is minor and that we will again have to wait until DCO documents are released as part of the DCO process.

We also asked NH/LTC to list the 50 bridges and viaducts that are claimed on the LTC website and elsewhere, with adequate detail for us to be able to identify them. The response we got was that

"*the structures are all indicated within the latest mapbooks and interactive map on the consultation website*".

This again is avoidance tactics, and hardly meaningful engagement when being asked a genuine question, as we are having trouble locating them all.
National Highways seem to have very little ability to back up the claims they are making on many different things.

Lack of consultation

We have discovered that National Highways have moved at least two construction compounds since the Community Impacts Consultation. Yet when we have questioned them on them during the Local Refinement Consultation we have been told that they are not consulting on them in this consultation. This is a matter that we have previously voiced concerns about, so it is something people are concerned about. They consider the changes to be minor and local. Moving construction compounds, especially when they are being moved closer to homes and alongside a Conservation Area is not what we deem to be minor or local. Plus this consultation is the Local Refinement Consultation, so local refinements should be consulted on.

There are other aspects we have asked questions on during the Local Refinement Consultation, only to receive a response from National Highways that they are not consulting on that aspect in this consultation. We again find this completely inadequate and unacceptable. We also draw attention to the fact that National Highways provide space in the consultation response form for 'Other' comments.

Website issues

We are also concerned that we have had reports of issues with submitting responses to the consultation. It's like NH don't want us responding to the consultation.

Since consultation

Generally

NH have been doing all they can to try and put a positive spin on the proposed LTC, with more misleading and biased information.

They have created an online map to show support for the project, encouraging people to add a pin to show their support. Yet they refuse to add an option to add a pin to show opposition. This is wrong on so many levels, because firstly it is discriminating against those who are opposed. Secondly, presenting this kind of information is again misleading as people who view it only get to see pins of support, not opposition, and this in turn can influence opinions.

Social Media and LTC website

NH have add their own 'rules' to their social media channels which are being used to control what can and can't be posted. They have stopped people from being able to share links, which means people cannot share evidence to back up claims and concerns they have.

NH have been hiding and deleting comments that are not against their 'rules', later admitting when pushed that they should not have been deleted. They allow those who support the LTC to post attacking comments against those of us who are opposed without always monitoring and deleting comments that go against their own 'rules'.

Whilst their rules are displayed on the social media channels, if you ask their representative who warns you about a comments to explain the rules they refuse to do so and tell you to email and ask. To us this clearly indicates that if the people policing these 'rules' cannot clarify them to us, they are likely not capable of monitoring and policing them fairly and adequately.

Generally the LTC social media channels and website are full of misleading and biased information in favour of the scheme, complete with greenwashing attempts with no evidence to back up many of their claims.

Fly through video

The most recent LTC consultation ended in June 2022. Something we have been asking for for some time has been an updated fly through video to help everyone better understand the proposal. The previous flythrough video was not a very good representation, and included misleading information.

On the 19th October 2022 National Highways a new interactive tool on the LTC website[22] When you click through to the new interactive tool, there is an option to view in full screen mode. When you do so it opens up a lot more info, including a new fly through video.

This video is embedded from the NH/LTC YouTube channel, which states the video was published 2 months ago[23].

Why after everyone asking for years for an updated fly through video, did NH leave it until after the consultation process had ended, and just before they submitted the DCO application to share such a video? How can it be adequate to omit to share such a video sooner?

To add insult to injury the opening text of the video states that the info in the video is based upon the preliminary designs presented at the Community Impacts Consultation in July 2021. It mentions the fact there have been changes since, but they have not been presented in the fly through video.

How can it be adequate not only to leave it so late to publish such a video, but when doing so for it not to even be up to date or a representation of the current design?

This is not the only time NH deemed it acceptable to share out of date info, similar happened in consultations too, like when they failed to update the map books and maps to reflect the changes to the number of lanes between the LTC and A13/Orsett Cock Roundabout, instead marking it as changed but not presented in the map.

Back to the fly through video we note mis-spelt place names, like Horford Road Bridge, instead of Hoford, shown around 6 mins 44 secs in the video for example.

It fails to label places as the flythrough goes close by certain areas, such as the Bonners Estate (Orsett), Chadwell St Mary when the flythrough is showing LTC as it passes Chadwell as the closest point, The Wilderness (South Ockendon) likely to avoid highlighting the LTC going through the long established ancient woodland.

The fly through video doesn't show detail of the proposals on the LTC/A13/Orsett Cock junction in any detail. Considering the complexity and impacts this section of the proposal would have, this is an obvious inadequacy.

[22] [redacted]

[23] [redacted]

Neither is there realistic representation of how busy the LTC and existing road network would be, if the LTC goes ahead. This gives a biased and unrealistic representation to people that there wouldn't be much traffic, which is simply not true.

NH DCO briefing paper

As a member of Thurrock Council's LTC Task Force committee, we have had a NH DCO briefing document shared with us for the November 2022 meeting. This document also has questionable, misleading information within in.

For example, there is reference that the LTC would be:
"*70 mph, high quality, free flow crossing* ***with no vehicle type restrictions***"

Would:
"*Nearly doubles cross river capacity* ***3 lanes in each direction***"

And also that:
"*Traffic using Dartford cut* ***by almost a quarter****, while enabling new journeys*"

This is all taken from just one page in the briefing.

The fact is that there would be vehicle type restrictions, since bicycles are vehicles[24] [25], but NH have stated categorically that cyclists would not be able to use the LTC. We were also advised during consultation that there would be restrictions for some vehicles.

Whilst the LTC tunnels would be 3 lanes in each direction, it fails to make clear that the southbound LTC from the M25 to past the A13 would be just 2 lanes.

As for "almost a quarter", NH official figures for reductions at the Dartford Crossing, if the LTC goes ahead, has been quoted as around 20%, which is not really almost a quarter. It fails to clarify that there would be an almost 50% increase in cross river traffic if LTC goes ahead.

[24] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904146/gear-change-a-bold-vision-for-cycling-and-walking.pdf

[25] [redacted]

Plus Thurrock Council's analysis of NH official traffic modelling data was that the Dartford Crossing would only be reduced by as little as 4% in the am peak, and 11% in the pm peak hour, if the LTC goes ahead.

Thurrock Council shared their analysis with NH, who failed to respond with any comment. The council then published their analysis publicly, which is when NH started to question the council.

Clearly this is a lack of meaningful engagement by NH yet again, both because they failed to address the council's comments on their analysis prior to publishing, and because the council still stand by their analysis and NH appear to be failing to acknowledge and discuss the findings.

Also, regardless of whether it is 4%, 11%, or 20% it would not be enough to bring the Dartford Crossing back below capacity, so fails to solve the problems. NH keep attempting to give the impression it will solve the problems when clearly it wouldn't.

The basic math back up this fact. The Dartford Crossing has a design capacity of 135,000 vehicles per day, yet regularly sees 180,000 per day. That means you'd need to remove more than 25% to just about bring it back below capacity.

On another page in the briefing NH detail the construction period, if the LTC goes ahead, to be 5-6 years, which does not match the 6-7 years that was detailed in the consultations.

The briefing is yet again biased as it details formal support for the LTC, but not any opposition. This again can influence opinion, and also fails to be a true reflection of circumstances as there is plenty of opposition. It is misleading misrepresentation to be presenting such a biased briefing. We can only assume NH would present similarly biased misleading info to other officials including Government, MPs and Ministers and others. It is unacceptable that a government company is not presenting things in a clear and informative manner.

Additional inadequacies

2017 business presentations

HE were giving a completely different 'sales pitch' on LTC to businesses than they were to residents and local authorities. At the Nov LTC Task Force meeting we asked to have access to any videos being shared with the business community and were told there were none available. Yet when we attended a business event the very next day a video was used in the presentation. Yet another example of biased behavior.

Common omissions in consultation materials

PM2.5 The Mayor of London has committed to London being compliant to WHO standards on PM2.5 by 2030. The north of the LTC route is in the London Borough of Havering, yet no mention to WHO standards for PM2.5 are mentioned in the consultation docs.

LA105 Air Quality HE have not made it clear if the new LA105 guidance on assessing air quality, which forms part of the 'Standards for Highway', dating from Nov 2019, has been taken into account. We can see no reference to it in the Environmental Updates.

CO2 / Net Zero When we asked HE/LTC what the predicted increase in CO2 would be for LTC, including embedded CO2 during construction phase, and for a copy of the Appraisal Summary Table for the scheme, we were told those figures would not be available until the ES is ready at DCO stage. We have since discovered that the PEIR document from the 2018 consultation contains details that 62,587 tonnes of carbon dioxide equivalent emissions are predicted in the opening year alone! We were not provided with this info or alerted by HE to the fact this info was available, even though we were asking for it during consultation. There have also not been any references as to how LTC complies with the Paris Agreement or Carbon Net Zero.

Ancient woodland and veteran trees HE has yet again failed to put a figure on the threat to this precious resource.

Investigative works issues

With extensive investigative works going on for some time, many people believe that construction had already started and therefore did not feel it worthwhile to take part in the consultation. HE have not gone out of their way to publicise the fact the works are purely investigative, sometimes using terminology such as preliminary works, which again suggests the start of construction. We have no doubt this impacted consultation response levels.

Also there have been many issues and concerns regarding the investigative works along the entire route, which has resulted in much time and effort needing to have been spent dealing with HE's inadequacies relating to the investigative works, which impacted the time and efforts that could be spent responding to consultations.

This included serious concerns during lockdown over the continuation of investigative works, and the blatant and repeated lack of social distancing by LTC workers. Damage by LTC workers to local roads, trees, communities. Inadequately placed lighting causing glare to road users and properties. Mud on roads, dangerous access to sites and poor signage in accident black spots. Workers parking on footpaths and cycle routes. LTC workers attempting to stop the public using public rights of way. LTC

workers urinating in public. LTC workers taunting the public. LTC workers parking inappropriately. Two retrospective planning applications to Thurrock Council for an LTC compound that was already in use. Recruitment events where people were being offered 7 year contacts despite HE only being able to commit to investigative works, not long term employment. Concerns over investigative works being carried out in areas of toxic historic landfill sites, and moderate to high risk Unexploded Ordnance areas.

We actually had to submit a Freedom of Information request to obtain info on Unexploded Ordnance, which was initially refused by HE. Following a request for an internal review they admitted[26] they had wrongly withheld the information. This is not meaningful engagement, and hardly constitutes clear and informative sharing of information.

All of these, and other inadequacies/concerns, have had to be dealt with, which has added to the impact the whole LTC process has had on lives and health of many residents in a negative way, whilst trying to take part in consultations.

Inconsistencies throughout consultation

Throughout the consultation period there has been no consistency in the description of the actual road. It has been referred to as a road, a motorway, an expressway, and an all-purpose trunk road. In 2018 associations to smart motorways were being made, but by 2020 after much negative media coverage of smart motorways, HE stopped using the terminology of smart motorway, and indeed the word motorway, instead referring to smart technology and signage. We do not feel that this can be considered clear or informative to keep changing the way they refer to the LTC in this way, it is again evidence of HE manipulating things to their own favour.

Failure to provide requested info

Throughout the consultation process HE went from 'go to statements' such as 'We'll get back to you on that' yet never actually responding. Another response to questions was "please raise your concerns in the consultation", whenever we were in a consultation period. And finally we reached a point when we asked questions that we were told the info would be in the DCO documents and we would have to wait.

LTC Project Director

The LTC project was without a Project Director between July 2019 when Tim Jones resigned and late June 2020 when we were told by HE a new Project Director had been appointed. The interim PD was noticeable by his absence, and there was a distinct lack of leadership and of anyone taking proper

[26] [redacted]

responsibility for the scheme and day to day running of the project during this time which included consultation periods.

Misleading and biased reporting

There has been ongoing misleading and biased reporting of LTC throughout the consultation period. Much of this has been down to HE's inadequacies, such as not providing up to date route maps, and instances like the 2019 Gravesend Reporter article[27] whereby HE's Complex Instrastructure Director, Chris Taylor was quoted saying "More than 29,000 people took part in our consultation last year, with more than 86 per cent of respondents agreeing with the need for a new crossing and clear majority in support of our proposals."

However, HE's own report states 28,493 took part, and we can't find a reference that adds up to 86%. We would also point out that the public were never actually asked if they agreed with a new crossing, but simply the Lower Thames Crossing which is a specific crossing not just a new crossing.

The estimated cost of LTC is also something that is so often misquoted due to HE's lack of transparency in the ever rising cost.

We have no doubt that these kinds of misrepresentations will have impacted consultation participation and outcomes over the years.

Tilbury Link Rd

The Port of Tilbury made it publicly and perfectly clear that they would only support LTC if they got a direct connection to it. This became known as the Tilbury Link Rd. The Tilbury Link Rd was included in maps, including those released by HE in July 2018. Yet by the Statutory Consultation starting in Oct 2018 the Tilbury Link Rd was removed. At this time a junction was in place that could be considered as a possible provision for the link road at a later date, but that has also since been removed.
We find it questionable to say the least that the Tilbury Link Rd was detailed and shown in official LTC materials, yet was never publicly consulted upon, and was also a key factor in HE gaining the likes of the Port of Tilbury's support for the scheme.

We also consider it to be an inadequacy despite the fact it was officially being shown as a feature on the LTC, and then removed, to now being listed as a separate stand-alone RIS3 pipeline project.

[27] [redacted]

Land & Property letters

Since the Design Consultation ended additional letters have been sent to some residents. Most recently at least 1800 letters regarding HE's desire to acquire land rights for sub soil. These letters were, for some residents, the first letter from HE's Land & Property team regarding their land. Surely anyone who is advised of a potential CPO if DCO is granted should have been advised of this potential threat during consultation period, and not after it ended, so they could have the opportunity to respond to consultation as an impacted party.

Generally, communication with Land & Property is slow, confusing template (not personalized) letters are sent and then the onus is on residents to email or call and then have the stress of waiting up to 15 working days (and sometimes longer) for a response.

Lack of meaningful engagement

Epping Forest

In the 2022 consultation NH included new information about nitrogen deposition, which mentioned the fact that Natural England and others have expressed concerns over the impacts to sites like Epping Forest Special Area of Conservation.

However, whilst the government department responsible for our natural environment have voiced concerns, NH have failed to apparently take this seriously, and have not consulted with those in the Epping Forest area. Surely if an area is considered to be impacted by the likes of Natural England, NH should be consulting those in said area. We deem this yet another inadequacy.

'Smart' motorways report/comms

NH have failed to provide clear information in regard to the fact that the LTC is being designed to 'smart' motorway standards.

Initially NH were describing the LTC as a motorway, but then when coverage of the dangers of 'smart' motorways got traction they suddenly started referring to it as a 'road' or 'expressway' and we are now told it is an All Purpose Trunk Road, but also that it is being designed to 'smart' motorway standards.

When we originally asked the difference between motorway and all purpose trunk road we were told the colour of the signs, blue for motorway and green for all purpose trunk road. NH have failed to provide any information which explains how the colour of the sign makes a road using 'smart' motorway standards any safer than a 'smart' motorway.

More detailed information on this inadequacy can be found on our website[28], including the evidence we produced to Government. At the time we, Thurrock Council, and Government were all told different information relating to the 'smart' motorway aspect of the proposed LTC. This is not clear and informative information being shared.

Local, regional, and national government and officials

The information relating to 'smart' motorways has not been an isolated case, we believe NH have been sharing information in a misleading manner with the government. Through our communication with MPs we know they are often given misleading information by NH. It is also apparent by the copied and pasted NH information on the government website that there is no independent monitoring of the information being presented to government. Not only does this mislead government officials, but also misleads some members of the public, as information on government websites should not be misleading.

We know from participating in consultations with the likes of Transport for South East there is also misleading info. In a very recent draft SIP update[29] TfSE states:

"*One of the most significant highways interventions planned for this part of the South East is the* ***Lower Thames Crossing, which will deliver a new motorway-standard crossing*** *between Essex and North Kent/Medway*"

This again highlights that NH have not made it clear to anyone the classification or design standard that the proposed LTC is being designed to. It seems that NH have given TfSE the impression it would be motorway standard too. Yet NH deny that the LTC would be a motorway to everyone else. Yet again this is not clear and informative.

We also note that Transport East's Strategy Consultation[30] was handled by Jacobs, who obviously also have links to the LTC. This is another inadequacy of consultation that such large companies are influencing public opinion and the opinions of bodies such as Transport East by association like this.

[redacted]

[redacted]

[redacted]

Local Authorities

As already mentioned Thurrock Council felt they had no option other than to submit a Freedom of Information request to try and obtain information relating to the LTC. They have voiced serious concerns about the lack of meaningful engagement, and lack of information being provided to them.

We understand that all our host local authorities have similar concerns about the adequacy of consultation too. This is a concern to us as a community group that our councils are not being provided adequate information to be able to ensure the best outcome for our areas and us.

We know from sitting on Thurrock Council's LTC Task Force committee that NH often try to avoid answering our questions at meetings. The fail to provide requested info, with many requests still outstanding. We hear that officers are attending meetings/briefings and leaving with more questions than answers, which is greatly concerning.

We know that NH refuse to allow Local Authorities to share the cordoned traffic modelling they have been given. This is not meaningful engagement and public perception is that NH are trying to withhold the information because it would prove how inefficient the proposed LTC would be at fixing the problems at the Dartford Crossing.

NGOs and groups

NGOs and others also have concerns about the inadequacies of consultation and lack of meaningful engagement, as highlighted by some in a joint letter to government [31], which we also are part of.

When the likes of the Woodland Trust, Transport Action Network, Buglife, Kent Wildlife Trust, CPRE Kent, Community Planning Alliance, South Essex Wildlife Hospital, Essex Badger Protection Group, West Kent Badger Group, Cycling UK, Kent County Councillor Bryan Sweetland (Gravesham Rural), Froglife, and Essex Wildlife Trust are all uniting to voice concerns not only about the LTC but the lack of meaningful engagement one has to be concerned.

In a recent consultation feedback update[32] NH stated:

''*A significant proportion of responses, more than 60%, were part of a campaign organised by the Woodland Trust. The Woodland Trust's website provided consultees with a standard response that could be tailored and submitted online. The general themes of that response included the loss of*

[31] [redacted]

[32] [redacted]

ancient woodland and veteran trees, deterioration of habitats from indirect impacts, carbon and nitrogen pollution and a failure to deliver information to understand the impact on the environment.

We continue to engage with the Woodland Trust on the points raised through the campaign."

This gives the impression that they are engaging with a large percentage of those who responded to the consultation with concerns. However, we understand that whilst the Woodland Trust have had some engagement with NH, NH have insisted that information that has been shared be kept confidential, so the Woodland Trust have not been able to share with anyone else. This cannot be considered meaningful engagement.

We also note that whilst they are stating more than 60% of responses came from a Woodland Trust campaign, NH have previously lumped thousands of TCAG campaign responses into one organised campaign response. We question whether these campaign responses have been handled in a fair and appropriate manner.

All through the LTC consultation process we have been told that it was not possible for there to be a new direct NCR 177 route north of the A2. At a meeting between NH and cycle group representatives NH said it was possible, which again shows the consultation process has not been adequate and how we have been misled.

Land & Property issues

As already highlighted previously there have been many issues and concerns regarding bad experiences and poor communications from the NH/LTC Land & Property team. We speak to and hear from a variety of people who have had terrible experiences and been treated very badly by the Land & property team. Although we have been involved in some instances and reported issues to NH, it seems they do not learn from their lessons and safeguards have not been put in place to ensure the same problems have not kept happening throughout the consultation process.

We also note that NH talk about engagement with private leisure/recreation site owners in the consultation materials, but having spoken to a large percentage of those people we know they by no means consider any engagement they have had with NH to be meaningful.

We are also aware of instances where land/property owners who are not within the order limits, but just outside them and their business would be impacted by construction works, if LTC goes ahead, had not heard from NH regarding the impacts or to advise them of consultation.

Greenwashing

NH have been attempting to greenwash the LTC too, which we again consider to be inadequate and misleading consultation.

Some examples include the fact they have been portraying their proposal for Hole Farm Community Woodland as mitigation/compensation for the LTC, when the reality is that they have stated publicly that the community woodland will be progressed regardless of whether LTC is granted permission or not. They have also failed to make it clear that they intend to use the community woodland as a nursery to grow trees to move along the proposed route, if the LTC goes ahead. They claimed the community woodland was to 'improve biodiversity' along their major routes (in this instance the M25) before having completed ecology surveys. Plus, when using Hole Farm to greenwash LTC they kept stating it was alongside the LTC, which is not true it is alongside the M25 to the north of junction 29, and the LTC wouldn't join the M25 until a way south of junction 29. All of this is definitely misleading and greenwashing.

They make claims of LTC being the greenest road every built, but there is no evidence to back up the claim it is purely greenwash and speculation. Plus let's face it the bar isn't that high anyway. But this kind of claim influences opinions unfairly.

They promote LTC as a pathfinder project using wording that suggests this means the LTC would be green. The reality is that there are no guarantees or evidence to prove the pathfinder status is anything other than a claim of intention with no guarantees of results.

They have made claims of reducing carbon emissions by 80%[33], which again is highly speculative with no evidence to back it up. The 80% comes from the government policy to stop the sale of petrol and diesel cars.

It has also been stated publicly that 42% of traffic using the Dartford Crossing is good vehicles[34], ie not cars, so how they came up with 80% reduction is questionable.

[33] [redacted]

[34] https://www.gov.uk/government/news/new-data-reveals-dartford-crossing-carrying-more-food-and-goods-than-ever-before

Again, no evidence for the 80%, it is purely speculative, and when considered alongside the fact[35] that the High Court ordered the Government to outline exactly how its net zero policies will achieve emissions targets, the scale of the speculation becomes even more apparent.

When you look at the data provided on carbon emissions our analysis[36] shows there was actually a 67% increase. To portray an 80% reduction when the figures show an increase is disingenuous.

They have been promoting a new 'Carbon Academy' which we again consider greenwashing. In their announcement they state things like "*45% of employees will be recruited from within 20-miles of the project*". This is again highly speculative, as they don't have permission and haven't started employing the majority of the staff that would be needed if the project goes ahead.

In an article about green infrastructure[37] COWI Engineering Director, Keith Bowers is quoted as saying:

"*As part of the engineering design, COWI worked with the projects design team to repeatedly revise the route to mitigate impacts on other protected areas from ancient woodlands to wetlands including six Sites of Special Scientific Interest (SSSIs). For example,* ***watercourse diversions were altered and retaining walls relocated to help protect The Wilderness, an ancient woodland with many rare bat species***."

The reference that watercourse diversion and retaining walls were relocated to help protect The Wilderness is questionable.

There was no retaining wall showing at The Wilderness at the 2018 Statutory Consultation – Map Book 1 General Arrangements (Sheet 17)[38]

There was a retaining wall showing at The Wilderness at the Jan- Apr 2020 Supplementary Consultation Map Book 1 General Arrangements (Sheet 17)[39]

35 [redacted]
36 [redacted]
37 [redacted]
38 [redacted]
39 [redacted]

We can't find any mention of the addition of the retaining wall in written consultation docs, only in the map book

There was a retaining wall showing at The Wilderness at the July-Aug 2020 Design Refinement Consultation Map Book 1 General Arrangements (Sheet 17) [40]

Again no written ref to retaining wall, only shown on map book.

Retaining wall remains in location at Wilderness through to present day maps.

Yet when we asked NH specifically about whether they acknowledged The Wilderness as ancient woodland at an LTC Task Force meeting in Feb 2021[41], we were told categorically by an NH representative that this was the first they heard of The Wilderness as an ancient woodland.

So the COWI article is stating that the watercourse diversions and retaining walls were about protecting The Wilderness, an ancient woodland. Yet the retaining wall has been shown on maps dating back to Jan 2020, and in Feb 2021 NH state it was the first they had heard of it being ancient woodland, and up to present day NH fail to acknowledge or identify The Wilderness as an ancient woodland when we question them about it.

It seems to us that NH and their contactors are stating The Wilderness is an ancient woodland when it suits their needs to attempt to greenwash the LTC, but they fail to acknowledge it when we raise serious concerns about the fact the LTC would destroy The Wilderness as an ancient woodland.

Press and media

There are many instances over the years, right up to present day where press and media are using outdated maps, images, cost and info for the proposed LTC when publishing articles.

This clearly shows that the information has not been shared in a way that makes it easy for people, including the press and media to keep track of.

[40] [redacted]

[41] [redacted]

Of course the misinformation that is published because of the confusion about what is current and what is not in regard to the LTC, adds to misleading information being shared publicly which influences opinion again.

Timing and delays

Policy changes

We also feel it relevant to note that consultation cannot be considered adequate when there are so many policies being reviewed and updated.

For instance, the National Policy Statement for National Networks is being reviewed and clearly needs to be updated to reflect the changes in legislation.

There are some glaring updates like this that will be needed, and yet NH give no indication that they have taken such things into account during the consultation process.

Legal challenges

Similarly there are many legal challenges that are relevant to the proposed LTC which again NH have given no indication that they have considered during consultation.

Changes in legislation

We know there is new legislation coming in, such as targets in the Environment Act for things like PM2.5. We know that the whole proposed LTC route would fail against the proposed targets that are due to be enshrined. Yet again NH show no indication that this is something that should be consulted on and addressed. They just appear to have buried their heads in the sand.

General changes

There is so much evidence to show the need for a review of the LTC, as so much as changed since 2009 when the original analysis of the need for a new crossing was first carried out.

NH are working with outdated data, and reasoning. What was considered acceptable and the norm then is generally not the case now.

A lot has changed since the only Statutory Consultation in 2018. New laws have been bought in, climate change has become more accepted as a genuine issue that needs to be addressed urgently. The need for provision for active travel and public transport investment is more apparent now than then. We've had Brexit and COVID that have changed things. Much has changed in regard to RIS2 with many calling for it to be reopened.

Alternatives that were ruled out back then are more relevant now, and should be reviewed again. Alternatives like rail improvements between Ashford and Reading that would negate the need for the LTC have never been given consideration or included in consultations.

Costs have risen considerably since the preferred route was decided and announced, yet NH have failed to make it clear to the public how much the cost is rising. When it comes to such a large amount of public money being spent, we should be kept updated, and we should be consulted on the latest costs and asked if it is considered value for money.

Traffic modelling and environmental surveys are out of date now. We have therefore not been provided with up to date information so that we can respond in a meaningful manner having adequate info to consider in consultation. Same goes for things like air and noise pollution data, we have not been provided with the latest info. Too much info has been withheld to be released at DCO stage. How can we be expected to give meaningful responses in consultation without having access to the relevant info? This is not adequate or meaningful engagement.

There are have been so many changes over the years, and the consultations so inadequate that we do not feel that many people actually have a clear image of exactly what is being proposed. How can we be expected to have a clear picture when NH have avoided sharing so much, and the info they have shared is either outdated, misleading, unclear, or inadequate?

Conclusion

We definitely consider the consultation process to have been completely inadequate as a whole.

The completely inadequate and not fit for purpose consultation in 2016 led us to a decision of a poor and unacceptable preferred route being announced and 'developed'.

Our understanding is that there are certain policies that NH need to follow and fulfil, and that the bar is low in their favour.

However, we would sincerely appreciate genuine consideration being given to the sheer volume of issues and inadequacies that have surrounded this consultation throughout, and how so many things that some may consider to be small, can amount to one very large inadequate and highly flawed consultation process.

This is not just a case of sour grapes, we the people have very serious concerns that the whole LTC consultation process from start to finish has most definitely been inadequate, and that the resulting DCO application should not be accepted due to lack of adequate consultation with clear and informative materials, giving adequate opportunity for we the people to respond in a fair and adequate manner.

Please do not hesitate to contact us if we can be of any further assistance, or you need clarification of anything we have shared in this document.

We thank you for your time and consideration of our representation.

Transport for London

Your ref: TR010032

Eleanor Church
Case Manager
The Planning Inspectorate
By email only

Transport for London
City Planning

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E20 1JN

[redacted]

tfl.gov.uk

16 November 2022

Dear Eleanor,

Lower Thames Crossing Development Consent Order application – adequacy of consultation request

Thank you for your letter of 1 November seeking views on whether the Applicant has complied with its duties to consult on and publicise the application in line with the requirements of the Planning Act 2008.

Transport for London (TfL) is satisfied with the level of consultation that has been undertaken on the Lower Thames Crossing scheme since the previous DCO application was withdrawn in November 2020. TfL has no further comments to make concerning the adequacy of consultation.

Please get in touch if you require any further information.

Yours sincerely

[redacted]

Matthew Rheinberg
Major Projects Manager – City Planning